NAC Form	366					1	lici	ENSE	EEVE	ENT R	EPORT	(LER)	U.S. N	UCLEAR REGULAT APPROVED ONB N EXPIRES 8/31/85	ORY COMMISSIO 3150-0104
FACILITY	-)											DOCKET NUMBE	R (2)	PAGE (3)
	Hadd	am No	eck										0 5 0 0	0 0 2 1 3	1 OF 0
TITLE 4	c	veto	m Trat		4+4										
EVI	INT DATE	(B)	T	egr	ILY SE NUMBER	e)	- 1		PORT DA	TE (7)	-	OTHER	EACH ITIES INV	DIVED (B)	
MONTH DAY YEAR YEAR SEQUENTIAL REVISION MONTH DAY YEAR FACILITY								FACILITY NA	MES	DOCKET NUMBER	A(S)				
NUMBER NUMBER							Not Applicat				le	0 15 0 0	1011		
1 1	1 4	8 5	8 5	5	0 3 0	0	0	1 2	1 1	8 5	Not	Applicat	le	0 15 10 10	1011
OP	RATING		THIS R	EPORT	IS SUBMITTE	D PURSUA	NT T	O THE R	EQUIREN	MENTS OF	10 CFR § /	Check one or more	of the following!	(11)	
	0010 (19)		20	0.40216	ð		-	20.405	(c)			50.73(a)(2)(iv)		73.71(b)	
LEVE		9.7	20	0.4051a	1(1)(0		-	50.36(c	1(1)		-	50.73(a)(2)(v)		73.71(c)	acity in Abstract
(10)	<u> </u>		2	0.405(a	3(1)(4)		X	50.3810	1(2)(i)			50.73(a)(2)(viii)	(A)	below and in 365A/	n Text, NRC For
			2	0.405(#	1(1)(iv)			50.73(1(2)(#)			50.73(a)(2)(viii)	(8)		
			2	0.406 (*	J(1)(*)			50.73ia)(2)(iii)			50.73(s)(2)(x)			
							LI	CENSEE	CONTAC	T FOR TH	IS LER (12)		-		
NAME													AREA COOL	TELEPHONE NUM	BER
Μ.	J.R	anie	ri, A	Isso	ociate	Engine	eer						2.0.3	2.6.7	.2.5.5.
					COMPLETE		FOR	FACH C	OMPONEN	T FAILUR	RE DESCRIPT	D IN THIS BERG	BT (12)		
CAUSE	SYSTEM	COMP	ONENT	N	ANUFAC TURER	REPORTA TO NPR	BLE			CAUS	SE SYSTEM	COMPONENT	MANUFAC	REPORTABLE TO NPROS	
		1	Ē						NA		1		1		NA
		-	11	1					NA						NA
	S lif yes o	omniere l	EXPECTE	O SUR	SUPPLEM	ENTAL REI	PORT	EXPECT	ED (14)				EXPEC SUBMIS DATE	TED MONTH	DAY YEA
ABSTRA	ct (Limit Duri disc IP) ally samp tati The Insp purg	revi ing a cover that 7, po bling ion o revi becto ge sy	rev red the rev red the rev red the rev red the rev rev rev rev rev rev rev rev rev re	*pprov iew hat rec ns (ipmo e to f T(est:	of Tec portio quired of the ent wer esting echnica ioned t	Province Innications of to be PASS Te not requi	the sthe pr liq ir rem cif cer	Gressu Juid Speci	fica ost A ire 1 samp ted is ion as t	tion ccide eak t ling durin the r 6.15 o the	6.15 " ent Sam ested equipm g refu eason was in requi	System I pling Sy were not ent and eling cy for the itiated red test	ntegrity' stem (PAS inspecte all of th cle 12. missed in when the ing for t	' it was SS - EIIS (ed. Specison A misinter aspections NRC Reside the hydrog	Code - fic- rpre- ent en
	80,5	512 DR	1900 ADO	10 ICK	85121 05000 P	1 213 DR								IE	22 Xi

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1)	DOCKET NUMBER (2)		LER NUMBER (6	PAGE (3)			
	위비합 이 것이 같이 있는 것이 같아.	YEAR	SEQUENTIAL NUMBER	NUMBER		Π	
Haddam Neck Plant	0 15 10 10 10 1 2 1 1 3	8 15	_0 1310	_ 0 10	0 12	OF	0 14

Background

On September 5, 1985 the NRC Resident Inspector approached Engineering personnel with a concern about a commitment to pressure leak test the hydrogen portion of the Containment Atmosphere Sampling System (CASS - EIIS Code - BB). The commitment was made in a memo (Docket No. 50-213) to the NRC from W. Counsil titled, TM1-2 Short Term Lessons Learned Implementation, dated April 11, 1980. A review by Engineering revealed that the hydrogen purge portion of the CASS had not been pressure leak tested since the commitment was made. The hydrogen purge portion is designed to release hydrogen from the containment building after an accident had occurred. Periodically, the hydrogen purge portion of the CASS is used to relieve excess pressure in containment.

The above finding led to an engineering review of Technical Specification 6.15, "System Integrity" to identify the systems that are required to be pressure leak tested. Systems required to be pressure leak tested are those with the potential to carry radioactive fluids outside containment during a serious accident or transient. The review revealed that portions of the PASS liquid sampling equipment and all of the gaseous sampling equipment have not been pressure leak tested since the post installation tests in the spring of 1982.

Reportability

This event is reportable under 10CFR50.73(a)(2)(i) since it involved a violation of a plant Technical Specification.

Root Cause

There are different causes for the missed pressure leak testing of the CASS and PASS.

The CASS pressure leak test was missed because the corporate commitment to perform it contained in Docket No. 50-213 to the NRC from W. Counsil title <u>TMI-2</u> <u>Short Term Lessons Learned Implementation</u>, dated April 11, 1980 was not incorporated into a station surveillance procedure. This was apparently due to a breakdown in the licensees commitment follow-up system.

The PASS pressure leak test was missed because the need to perform it was not identified and therefore it was not incorporated into a station surveillance procedure. The appropriate place to identify the tie between the PASS and Technical Specification 6.15 is the Plant Design Change Request (PDCR). A review of the PASS PDCR and the current PDCR form revealed that there is no formal way to establish such a tie on either document.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104 EXPIRES 8/31/85

FACILITY NAME (1)	DOCKET NUMBER (2)		LER NUMBER (6)						PAGE (3)			
		YEAR		SEQUENTIAL NUMBER		REVISION NUMBER	_		Γ	Γ		
Haddam Neck Plant	0 5 0 0 0 2 1	3 8 5	_	01310	-	ορ	0 3	OF	0	14		

TEXT (If more space is required, use additional NRC Form 366A's) (1

Evaluation

RC Form 366A

If a serious accident had occurred it is probable that the PASS (Liquid and Gaseous) would not have leaked. Hydrostatic and pneumatic tests performed in April and May of 1982 verified system integrity and almost all connections are welded, which reduces the number of potential leakage paths.

The integrity of the hydrogen purge portion of the CASS is not as certain as that of the PASS since there is a lack of recent test data. However, Docket No. 50-213 from W. Counsil to D. M. Crutchfield - Haddam Neck Plant Combustible Gas Control Evaluation - dated March 4, 1983, states that a 13 month interval after an accident would be available to restore the purge system before it would be needed for use. Thus, ample time would be available to ensure system integrity prior to use.

It should be noted that leakage from either system would end up in the Primary Auxiliary Building (PAB) and would eventually be monitored by either the Particulate Iodine Noble Gas Monitor (PING-1) or the stack monitor. This represents a continuous check, albeit qualitative, on the integrity of both systems.

Corrective Action

1). Short Term Action

In view of the above findings the CY System Integrity Program will be revised to include the hydrogen purge portion of the CASS and the PASS. The following is a list of all systems required to be inspected:

- 1) Residual Heat Removal System (RHR)
- Charging System including loop fill header, seal supply, charging suction from RHR and seal return
- 3) High pressure safety injection discharge and suction from RHR
- 4) Sample System
 - a) PASS liquid portion
 - b) PASS air portion
 - c) Loop sample to sample sink valves
 - d) RHR sample to sample sink valves
 - e) 6 common loop sample lines to sink valves
- 5) Hydrogen Purge System up to VS-V-152 (entrance to PAB ventilation discharge plenum).

All testing will be completed by end of 1986 outage.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB ND. 3150-0104 EXPIRES 8/31/85

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)			
		YEAR SEQUENTIAL REVISION NUMBER NUMBER				
Haddam Neck Plant	0 5 0 0 0 2 1 3	3 8 5 - 0 3 0 - 0 0	0 14 OF 0 14			
TENT IN ANTICIDE ANTICIDE ANTICIDE ANTICIDE ANTICIDE	an a	and and a standard and a standard and a standard				

TEXT (If more space is required, use additional NRC Form 366A's) [17

NRC Form 366A

2). Long Term Actions to Prevent Recurrence

The licensee feels that the increased vigilance of its engineering and management personnel in the wake of the recent Connecticut Yankee design change problems, will substantially reduce the chances of missing an important commitment such as pressure leak testing the CASS hydrogen purge portion again. This vigilance was enhanced by several means including strengthening of procedures and training. Perhaps most germane to this event is the "Nuclear Safety Ethic" training that was attended by all Nuclear Engineering, Operations Engineering and Management personnel. This training was designed to foster a desire for excellence in the operation and maintenance of Northeast Utilities' Nuclear Plants.

The licensee is currently evaluating appropriate means to track implementation of Technical Specification and/or procedural requirements in all new PDCR's.





HADDAM NECK PLANT RR#1 • BOX 127E • EAST HAMPTON, CONN, 06424

TEN

December 11, 1985

U.S. Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555

Reference: Facility Operating License No. DPR-61 Docket No. 50-213 Reportable Occurrence LER 50-213/85-030-00

Gentlemen:

This letter forwards the Licensee Event Report 85-030-00, required to be submitted within thirty days, pursuant to the requirement of Connecticut Yankee Technical Specifications.

Very truly yours,

Extlum

Richard H. Graves Station Superintendent

RHG:MJR/lac Attachment: LER 85-030-00

cc: Dr. T. E. Murley, Region I