

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Catawba Nuclear Station, Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 1 1 3	PAGE (3) 1 OF 0 4
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TITLE (4) Penetration Surveillance Interval Exceeded Due to Personnel Error and Defective Procedure

EVENT DATE (5)			LER NUMBER (6)		REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
0 3	1 7	8 6	8 6	0 1 6	0 0	0 4	1 6	8 6	N/A	0 5 0 0 0
									0 5 0 0 0	

OPERATING MODE (9) 1

POWER LEVEL (10) 1 1 0 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)

20.402(b)	20.408(e)	50.73(a)(2)(iv)	73.71(b)
20.408(a)(1)(i)	50.38(a)(1)	50.73(a)(2)(v)	73.71(e)
20.408(a)(1)(ii)	50.38(a)(2)	50.73(a)(2)(vi)	<input checked="" type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 365A)
20.408(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	50.73(a)(2)(vii)(A)	
20.408(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	50.72(b)(1)(i)
20.408(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME Roger W. Ouellette, Associate Engineer - Licensing	TELEPHONE NUMBER AREA CODE 710 14 31713 1-1715 B 10
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single space typewritten lines) (16)

On March 17, 1986, at 1410 hours, it was discovered that the Catawba Periodic Test (CPT) program allowed a 25% grace period for the 24 month surveillance requirement of the Mechanical Penetration Bellows Integrity Test Procedure. This was in error because the grace period provision is not applicable for bellows integrity testing as stated in Technical Specifications (Tech Specs). Nine untested penetrations were declared inoperable and power reduction was begun to comply with Tech Specs. The bellows integrity testing for the 9 remaining penetrations was completed soon thereafter. The unit was at 100% power at the time of this incident.

On March 18, 1986, at approximately 1100 hours, a penetration was discovered to have been omitted from the Mechanical Penetration Bellows Integrity Test Procedure. The penetration was declared inoperable. A procedure change was initiated and the bellows integrity testing on the penetration was completed. The unit was at 48% power at the time of this incident.

The first incident is assigned Cause Code A, Personnel Error. Personnel failed to ensure that the surveillance time requirement, as entered in the CPT, was correct as stated in Tech Specs.

The second incident is assigned Cause Code D, Defective Procedure. The Mechanical Penetration Bellows Integrity Test Procedure did not contain a penetration, listed in Catawba FSAR, as requiring testing under Tech Specs.

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

BACKGROUND

Catawba surveillance commitments, procedures identified to satisfy these commitments, and surveillance procedure responsibility assignments are identified by the Catawba Periodic Test (CPT) program data base. This data base is maintained to accurately reflect the status of the Catawba Surveillance program. A periodic test scheduling status is generated by the CPT and is maintained and distributed. The program includes all periodic testing, calibration, or inspection required by regulatory requirements or licensing commitments which have a surveillance frequency of or greater than one month. The CPT derives required time intervals for tests, allowing for the grace period provision of Technical Specification (Tech Spec) 4.0.2. Any test, for which Tech Spec 4.0.2 is not applicable, must be manually adjusted in the CPT to eliminate the allowed grace period. For each test, the CPT will give the test frequency, last date performed, next date to be performed (Next Test Date) and latest date test can be performed (Latest Test Date).

Tech Spec 4.0.2 states that each surveillance requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

Tech Specs 4.6.1.2h and i requires the space between each dual-ply bellows assembly on containment penetrations be subjected to a low pressure test once per 24 months and states that provisions of Tech Spec 4.0.2 are not applicable.

Tech Spec 3.0.3 states that when a Limiting Condition for Operation is not met, within one hour, initiate action to place the unit in a mode in which the specification does not apply.

DESCRIPTION OF INCIDENT

On January 28, 1986, Periodic Test PT/1/A/4200/01G, Mechanical Penetration Bellows Integrity Test Procedure was begun. The CPT indicated a Next Test Date of January 27, 1986, and a Latest Test Date of July 29, 1986. On February 4, 1986, PT/1/A/4200/01G was delayed because of a manpower shortage. There were no real concerns over the delay because of the sufficient time provided by the Latest Test Date.

On March 17, 1986, while reviewing the CPT for scheduling impacts it was discovered that the CPT incorrectly allowed grace time for PT/1/A/4200/01G as stated in Tech Specs 4.6.1.2h and i. At 1410 hours, the responsible test personnel were notified that PT/1/A/4200/01G should have been completed by January 27, 1986. At this time, with the unit at 100% power, the 9 untested penetrations (M-110, M-354, M-261, M-262, M-309, M-393, M-422 and M-423) were declared inoperable and the unit entered Tech Spec

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

3.0.3. At 1510 hours, power was being decreased to comply with Tech Specs and testing of the 9 untested penetrations was begun. At 1830 hours, testing on the 9 untested penetrations was completed. They were declared operable and the unit exited Tech Spec 3.0.3.

On March 19, 1986, at approximately 1100 hours, during comparison of PT/1/A/4200/01G to the Catawba FSAR, it was discovered that penetration M-221 was omitted from PT/1/A/4200/01G. At 1245 hours, it was verified that penetration M-221 required testing. M-221 was declared inoperable, and the unit entered Tech Spec 3.0.3. A procedure change was implemented to add M-221 to PT/1/A/4200/01G and testing of the penetration was begun. At 1305 hours, the testing for M-221 was completed, and it was declared operable. The unit then exited Tech Spec 3.0.3. At 2300 hours, power was increased and the unit was at 100% power on March 19, 1986, at 1200 hours.

CONCLUSION

The first incident is assigned Cause Code A, Personnel Error. Personnel failed to ensure that the surveillance time requirement for PT/1/A/4200/01G, as entered in CPT, was correct as stated in Tech Specs. The original draft of Tech Spec 4.6.1.2h did not contain a specific time interval requirement. It was tied to the time interval of 3 years for the overall Integrated Containment Leakage Rate test. On May 31, 1984, a Tech Spec change was implemented to incorporate a 24 month time interval to Tech Spec 4.6.1.2h. During this period of time, a general overall review of Tech Specs and the CPT was being conducted in preparation for the initial issuance of Tech Specs. This review did not alert personnel to the fact that the grace period provision of Tech Spec 4.0.2 was not applicable to Tech Spec 4.6.1.2h. The individual responsible for the CPT did not manually adjust the time interval to eliminate the grace period. Between May and September of 1984, the responsibility for the CPT was in the process of being turned over between three individuals. Therefore, it is impossible to determine who had specific responsibility for the CPT during the time of the Tech Spec revision. Management does not feel that corrective action is necessary for personnel errors as described in this incident.

The second incident is assigned Cause Code D, Defective Procedure. Penetration M-221, which is listed in the Catawba FSAR as requiring testing under Tech Spec 4.6.1.2h, was omitted from PT/1/A/4200/01G. When the preoperational test for bellows integrity was performed, penetration M-221 was tested and documented as M-377. This was due to M-221 being mislabeled as M-377. Therefore, the completed preoperational test procedure contained two data sheets for M-377. During the development of PT/1/A/4200/01G, the preparer used the preoperational test procedure as a guide and M-221 was omitted. The review process for the procedure approval failed to verify the penetrations in the procedure against the referenced FSAR Table 6.2.4-1 to ensure completeness.

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There have been no previous reported incidents of these types.

CORRECTIVE ACTION

- (1) Testing on the nine untested penetrations was completed.
- (2) A procedure change to add penetration M-221 to PT/1/A/4200/01G was implemented.
- (3) Testing on penetration M-221 was completed.
- (4) A review of CPT against Tech Specs to ensure that all surveillance requirements and time intervals are correct will be performed.

SAFETY ANALYSIS

All penetrations, including M-221, were successfully tested during preoperational testing. All penetrations, including the 10 that exceeded the surveillance time interval, were again satisfactorily tested under PT/1/A/4200/01G.

Under normal operating conditions, any leakage through a penetration into the annulus would have been drawn into the Auxiliary Building Ventilation (VA) System (EIIS:VF) and monitored by the VA radiation monitor (EMF). Any leakage into Containment would have been released out the Unit Vent through the Containment Air Release and Addition System and monitored by the Containment and Unit Vent EMFs.

Under post-accident conditions, the Annulus Ventilation System (EIIS:VC) would have initiated on a safety injection signal. Any leakage from Containment to the Annulus through a penetration would have been routed through absolute filters and monitored and released through the Unit Vent.

The health and safety of the public were not affected by this incident.

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NUCLEAR PRODUCTION

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April 16, 1986

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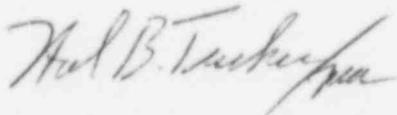
Subject: Catawba Nuclear Station, Unit 1
Docket No. 50-413

Gentlemen:

Pursuant to 10 CFR 50.73 Section (a) (1) and (d), attached is Licensee Event Report 413/86-16 concerning the surveillance time interval for several containment penetrations being exceeded due to a personnel error and a defective procedure.

This event was considered to be of no significance with respect to the health and safety of the public.

Very truly yours,



Hal B. Tucker

RWO:slb

Attachment

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1/1

Document Control Desk
April 16, 1986
Page Two

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