NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/85

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
DIABLO CANYON UNIT 2	0 5 0 0 0 3 2 3	1 OF 0 4

TITLE (4) MISSED SURVEILLANCES OF A CONTAINMENT PENETRATION DUE TO INADEQUATE PROCEDURES

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 5	0 7	8 5	8 5	— 0 2 6	— 0 0	0 3	1 1	8 6		0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9)	6	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)											
POWER LEVEL (10)	0 0 0		20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)				
			20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)				
			20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER (Specify in Abstract below and in Text, NRC Form 366A)				
			20.405(a)(1)(iii)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)(A)						
			20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)						
			20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)						

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
JACQUELINE R. HINDS, REGULATORY COMPLIANCE ENGINEER	AREA CODE 8 1 0 5 5 1 9 5 1 - 1 7 3 5 1 1

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

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

On May 7, 1985, Unit 2 entered Mode 6 (Refueling) for the first time without performing Technical Specification Surveillance Requirement 4.9.4 for the spare instrument test line located at containment penetration 82.

An NRC resident inspector informed plant engineers of discrepancies between FSAR Update Table 6.2-39 and actual plant configuration on February 6, 1986. On February 9 and 10, 1986, a plant engineer inspected containment penetration 82 and identified a spare capped instrument test line that was not included in the appropriate surveillance test procedures.

An inadequate procedure review by plant engineers resulted in the spare instrument test line not being included in the appropriate procedures. To prevent recurrence, the DCPP Engineering department has implemented a program to ensure that an independent walkdown or dry run of a revised procedure is performed as applicable as part of the independent verification process.

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* U.S.GPO:1986-0-464-481/18790

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

I. Initial Conditions

The Unit was in Mode 6 (Refueling).

II. Description of Event

A. Event

An NRC resident inspector was verifying the DCPP Units 1 and 2 FSAR Update, Table 6.2-39, "Containment Piping Penetrations and Valving," to the actual plant configuration. This verification identified discrepancies between Table 6.2-39 and the actual plant configuration. On February 6, 1986, the inspector informed plant engineers of these discrepancies. One of these discrepancies involved containment penetration 82.

On February 9, 1986, a plant engineer inspected containment penetration 82 (PEN) outside containment. He identified what appeared to be a spare capped instrument test line that was not included in the appropriate surveillance test procedures (STPs). On February 10, 1986, a plant engineer entered containment and verified that the spare instrument test line penetrated containment and was capped.

Since this spare instrument test line was not included in the appropriate STPs, when Unit 2 entered Mode 6 (Refueling) for the initial fuel load on May 7, 1985, Technical Specification 4.9.4 was not met. When Unit 2 entered Mode 4 (Hot Shutdown) for the first time on July 19, 1985, Technical Specification 4.6.1.1a was not met.

B. Inoperable structures, components, or systems that contributed to the event:

None

C. Dates and approximate times for major occurrences.

1. May 7, 1985: Event Date

2. February 10, 1986: Discovery Date

D. Other system or secondary functions affected:

None

E. Method of Discovery:

An NRC resident inspector informed plant engineers of discrepancies between FSAR Update, Table 6.2-39 and actual plant configuration. One of

these discrepancies involved containment penetration 82. Plant engineers inspected containment penetration 82 and identified a spare capped instrument test line that was not included in the appropriate STPs.

F. Operator Actions:

None

G. Safety system responses:

None

III. Cause of Event

A. Immediate Cause:

Surveillance Test Procedures I-1C, "Routine Weekly Checks", I-1D, "Routine Monthly Checks Required by Licenses," and V-6, "Position Verification of Penetration Test Connection Valves" did not identify the instrument test line on containment penetration 82. Therefore, the Technical Specification surveillance requirements were never met for this containment penetration.

B. Root Cause:

An inadequate verification of the procedures was conducted. When the Unit 2 procedures (STPs I-1C, I-1D and V-6) were prepared, plant engineers performed walkdowns to verify the procedures. The spare instrument test line is difficult to see due to lagging that surrounds the penetration.

IV. Analysis of Event

A successful ILRT was performed in August, 1984. It would have been impossible to perform this test with the subject penetration open. When the spare instrument test line was identified in February 1986, it was found capped. Therefore, it can be concluded that the instrument test line has been capped since August 1984. There were no adverse safety consequences or implications resulting from this event.

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

V. Corrective Actions

On February 11, 1986, Surveillance Test Procedures (STP) I 1-D, "Routine Monthly Checks Required by Licenses", and V-6, "Position Verification of Penetration Test Connection Valves" had on-the-spot-change (OTSC) issued to include the spare instrument test line. The instrument test line inside containment was sealed and STP V-6 performed by the DCPP Operations Department. Also, a plant engineer placed a seal on the line outside containment. STP I-1D was performed on February 14, 1986 for transition from Mode 5 (Cold Shutdown) to Mode 4 (Hot Shutdown) which verified the instrument test line outside containment was capped and sealed.

The Unit 2 penetration area was walked down outside containment by plant engineers to verify that all the penetrations were adequately addressed in the procedures. No discrepancies were found between the STPs I-1D and V-6 and the actual plant configuration. The spare instrument test line will be included in STP I-1C, Mode 6 Checklist, "Weekly Checks Required by Licenses", prior to the first refueling which is when the procedure will be utilized.

Numerous walkdowns and leak rate tests have been performed on Unit 1 containment penetrations using the appropriate procedures. Therefore, it was determined that a walkdown of the Unit 1 containment penetrations was unnecessary.

To prevent recurrence, the DCPP Engineering Department has implemented a program to ensure that an independent walkdown or dry run of a revised procedure is performed, as applicable, as part of the independent verification process.

Corrections to Table 6.2-39, of the FSAR Update, will be incorporated in the next revision to the FSAR Update.

VI. Additional Information

A. Failed components:

None

B. Previous LERs on similar events:

None

PACIFIC GAS AND ELECTRIC COMPANY

PG&E

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JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

March 11, 1986

PGandE Letter No.: DCL-86-069

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

Re: Docket No. 50-323, OL-DPR-82
Diablo Canyon Unit 2
Licensee Event Report 2-85-026-00
Missed Surveillances of a Containment Penetration
Due To Inadequate Procedures

Gentlemen:

Pursuant to 10 CFR 50.73(a)(2)(i), PGandE is submitting the enclosed Licensee Event Report concerning missed surveillances of a containment penetration due to inadequate procedures.

This event has in no way affected the public's health and safety.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,

for J. D. Shiffer

Enclosure

cc: L. J. Chandler
R. T. Dodds
J. B. Martin
B. Norton
H. E. Schierling
CPUC
Diablo Distribution
INPO

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