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On September 23, 1987, a maintenance work request was prepared stating that the charging header pressure indicator (PI-204) was reading 1000 psi more than the local process pressure gauge. The shift supervisor did not realize that the outboard containment isolation valves on the RCP seal injection piping system could be affected. The pressure transmitter could not be recalibrated and a replacement was ordered. On January 26, 1988, while the plant was in Mode 4, prior to initial criticality Engineering discovered during a Technical Specification Surveillance review meeting, that the charging header pressure instrumentation loop did not have surveillance requirements with respect to containment isolation. The pressure transmitter (PT-204) monitors the charging header pressure and provides an isolation signal to the Reactor Coolant Pump (RCP) seal injection containment isolation valves should a low charging pump discharge header pressure occur. The charging header pressure instrumentation loop was retested with a replacement transmitter in service and the loop was declared operable on January 28, 1988. There were no adverse safety or radiological consequences as a result of this event since the plant had not achieved initial criticality and no radioactivity had been produced. The event did not produce any additional risk to the public. The event is reportable pursuant to IOCFR50.73 (a)(2)(i)(B).

NL.LER88010

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ABSTRACT (Limit to 1400 species i.e. approximately fifteen single space typewritten

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104

EXPIRES 8/31/85

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

DESCRIPTION OF OCCURRENCE:

On September 23, 1987, a Maintenance Work Request (MWR) was written by an operator stating that the charging header pressure indicator (PI-204) was reading 1000 psi more than the local process pressure gage. When the shift supervisor reviewed and approved the MWR, he failed to recognize that the inability of (PT-204) to properly indicate low header pressure would result in the inoperability of the (P-204) pressure instrument loop violating Technical Specification 3.6.3 (Containment Isolation Valves). The technician working on the MWR was not able to calibrate the transmitter (PT-204) and determined that it needed to be replaced. / replacement transmitter was due to arrive on site in May 1988.

Containment Isolation Valve operability is required for plant operating Modes 1 through 4. Unit 1 entered Mode 4 on October 31, 1987. Based on the as found calibration data taken in response to the MWR for (PT-204), the setpoint of 400 psi would never have been reached on decreasing pressure. This would have prevented automatic closure of the four seal injection containment isolation valves (B1CV-MOV-0033A, B, C, D) upon a Containment Isolation Phase A signal coincident with low charging header pressure. Therefore, the inoperability of this instrument loop resulted in violation of the Technical Specification on Containment Isolation Valve operability.

As a result of LER 88-006, I&C personnel were reviewing Solid State Protection System (SSPS) master relays to ensure that they were appropriately tested. At approximately 1300 hours on January 26, 1988, with Unit 1 in Mode 4, as a result of the above mentioned review, Engineering discovered that no surveillance testing on the charging header pressure instrument loop was being performed or was specifically required by current plant procedures. Additionally, only a portion of the loop was included in the Preventive Maintenance Program for testing on a regular 18 month cycle basis. On January 27, 1988 at 2205 hours, the NRC was notified of this event. The transmitter was promptly replaced, and on January 28, 1988 at approximately 0138 hours, this loop was tested and declared operable.

Closure of the seal injection Containment Isolation valves during safety injection is not present in most other Westinghouse plants, since the charging pumps usually also perform a Safety Injection (SI) function. On those plants, seal injection is maintained, not isolated, since at least one charging pump remains operating. STP has separate SI pumps, and the charging pumps are not required for SI, but it is desirable to maintain seal injection during small break LOCA so that RCPs can be run. The charging header low pressure interlock was provided to initiate containment isolation upon a loss of seal injection flow.

NL.LER88010

NRC Form 366A

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

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

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

The STP Technical Specifications were developed using the Standard Technical Specifications for Westinghouse plants. The Standard Technical Specifications do not contain this feature and it was not identified during technical specification development for STP as a unique feature of comparable importance to other functions listed in the standard Technical Specifications.

CAUSE OF OCCURRENCE:

The program for generation and approval MWR's was not effective in that sufficient guidance for making decisions relative to equipment operability was not provided to the shift supervisor.

A contributing factor was that the charging header pressure instrument loop was not identified in the Technical Specifications.

ANALYSIS OF EVENT:

There were no adverse safety or radiological consequences as a result of the charging header pressure instrument loop not being operable since Unit 1 had not been critical, no radioactivity had been produced, and proper charging header pressure was promptly verified. The event did not result in any additional risk to the public.

This event was reportable pursuant to 10CFR50.73 (a)(2)(i)(B) since Unit 1 entered mode 4 with a part of the Containment Isolation Valve actuation function inoperable.

CORRECTIVE ACTION:

- An evaluation of the program for generation and approval of MWR's will be completed by March 15, 1988 with program enhancements including more detailed guidance to operating personnel relative to determination of equipment operability implemented by April 15, 1988.
- 2. A proposed Technical Specification amendment is being developed to add the low charging header pressure instrument loop operability for Limiting Condition for Operation and Surveillance Requirements. This proposed amendment is scheduled to be submitted to the NRC by April 4, 1988.
- 3. The surveillance procedure is being developed to test this actuation function consistent with other Engineered Safety Features (ESF) functions and to satisfy the proposed Technical Specification requirement by May 15, 1988. The surveillance frequency is once per 18 months or each refueling.

NL.LER88010



P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

February 25, 1988 ST-HL-AE-2542 File No.: G26 10CFR50.73

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555

> South Texas Project Electric Generating Station Unit 1

Docket No. STN 50-498
Licensee Event Report 88-010 Regarding Inoperability of Reactor
Coolant Pump Seal Injection Containment Isolation Valves

Pursuant to 10CFR50.73 Houston Lighting & Power Company (HL&P) submits the attached Licensee Event Report (LER 88-010) regarding the inoperability of Reactor Coolant Pump Seal Injection Isolation valves. This event did not have any adverse impact on the health and safety of the public.

If you should have any questions on this matter, please contact Mr. C.A. Ayala at (512) 972-8628.

G. E. Vaushn by G. E. Vaughn Vice President

Nuclear Plant Operations

GEV/PDN/ae

Attachment: Licensee Event Report Regarding

Inoperability of Reactor Coolant Pump Seal Injection Containment

Isolation Valves

JE22

ST-HL-AE-2542 File No.: G26 Page 2

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