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On June 21, 1988, Waterford Steam Electric Station Unit 3 was operating at 100% power when a previous reportability conclusion was determined to be in error. On May 17, 1988, a utility engineer discovered a mechanical snubber disconnected. The snubber (SISR-1352) is connected to valve S1-404A in the Shutdown Cooling (SDC) system. Under the snubber reduction program, calculations have been performed to remove several snubbers from the SDC system, including SISR-1352. The work package to implement this program is scheduled to be performed during the next refueling outage. Another evaluation has been performed which demonstrated the operability of the SDC system was not affected with this snubber disconnected. Since there was no effect on any systems, this event was initially determined to be not reportable. However, on June 21, it was determined that since the snubber had not yet been deleted from the design, its removal by itself should be reported. The snubber was inspected on April 8, 1988, however a mechanic remembers a snubber was not connected to SI-404A on April 25. The plant is considered to have been in a condition prohibited by Technical Specification 3.7.8 from April 25 to May 19, whenever SDC Train A was required to be operable.

Since this snubber will be removed, and its being disconnected did not affect the operability of the SDC Train, this event had no safety significance.

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NRC Form 366A (9.83)	LICENSEE EVENT	REPORT (LER) TEXT CON	TINUA	тю	N		U.S. NU AJ EX	PROVED C PIRES: 8/31	GULATOP DMB NO. 1 1/88	1150-0	MMISSIO
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TEXT (If more space is required, use additional NRC Form 368A's) (17)

On June 21, 1988, Waterford Steam Electric Station Unit 3 was operating at 100% power when a previous reportability conclusion was determined to be in error. At 1400 hours on May 17, 1988, the plant was in cold shutdown when a mechanical snubber (EIIS Identifier BP-SNB) was discovered to be disconnected. The snubber (SISR-1352) should have been connected to thermal relief valve (EIIS Identifier BP-RV) SI-404A in the shutdown cooling system (EIIS Identifier BP) which is part of the Safety Injection (SI) system (EIIS Identifier BO). The purpose of SI-404A is to relieve pressure which may build up between two isolation valves (EIIS Identifier BP-ISV) which separate the shutdown cooling system and the reactor coolant system (EIIS Identifier AB). As part of the ongoing snubber reduction program a piping analysis had been performed on the SI system, and several snubbers were determined to be unnecessary and will be removed. One of the snubbers to be removed is SISR-1352. The Station Modification Package which will remove the unnecessary snubbers is scheduled for implementation during the third refueling outage. Then the snubber was discovered disconnected, an additional evaluation was performed to determine the effect of the removal of this single snubber on the shutdown cooling system. This evaluation concluded the operability of the system was unaffected. Since there was no effect on any systems required by Technical Specification (TS) this event was initially determined to be not reportable. However, on June 21, 1988, it was determined that since this snubber had not yet been deleted from the approved design and there were times while the snubber was removed that Shutdown Cooling Train A was required to be operable, the disconnection of this snubber per se should be interpreted as a condition prohibited by TS 3.7.8 even though this condition is known not to have affected system operability.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

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On April 8, 1988, SISR-1352, which is an inaccessible snubber during portr operations due to its location in the reactor containment building (EIIS Identifier NH), was satisfactorily visually inspected in accordance with Surveillance Procedure PE-5-011 "Mechanical Snubber Visual Inspection". On April 25, 1988, SI-404A was removed for maintenance. The utility mechanic who performed the job remembers that he did not have to disconnect a snubber to remove the valve. The work instructions used by the mechanic did not require a snubber to be disconnected. The valve was reinstalled by another mechanic on April 26, 1988. Since the work instructions did not mention a snubber the mechanic did not connect one. On May 17, 1988, a utility engineer discovered the snubber disconnected. A work package was issued and the snubber was reconnected on May 19, 1988. A subsequent investigation revealed no evidence as to when the snubber was actually disconnected. It must therefore be assumed that the snubber became inoperable on April 25, when a mechanic remembers a snubber was not connected to the valve. Between April 25, 1988 and May 19, 1988, Shutdown Cooling Train A was required to be operable from April 28 to May 5, and May 12 to May 19. Therefore the plant is considered to have been in a condition prohibited by TS 3.7.8. during the above two time periods.

Since it cannot be determined when or why the snubber was disconnected, the root cause of this event could not be determined. However, a contributing cause is that the work instructions did not mention removing and reinstalling a snubber from the valve. Normally work instructions mention removing and reinstalling a snubber; however, the location of the valve, SI-404A, prohibited the standard practice of walking down the job since the job was planned during power operations prior to the refueling outage. While planning the job, the work planner inadvertently overlooked the snubber on the drawing. The necessity for attention to detail in work packages has been reemphasized with the planner involved. Since calculations have been performed to remove this snubber in the third refueling outage and an evaluation determined the disconnected snubber did not affect the operability of the shutdown cooling system, this event is considered to have no safety significance.

NRC Form 366A

NRC Form 386A (9-83)	E EVENT REPORT (LER) TEXT CONTINU	S. NUCLEAR REGULATORY COMMI APPROVED OMB NO. 3150-0104 EXPIRES: 8/31/88				
FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)		
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TEXT IN more space is required, use additional NRC Form 366A's/ (17)

SIMILAR EVENTS

None

PLANT CONTACT

D.E. Baker, Event Analysis, Reporting and Response Manager, 504/464-3133



POWER & LIGHT / WATERFORD 3 SES . PO. BOX B . KILLONA, LA 70066-0751

July 11, 1988

W3A88-0075 A4.05 QA

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

SUBJECT: Waterford 3 SES Docket No. 50-382 License No. NPF-38 Reporting of Licensee Event Report

Attached is Licensee Event Report Number LER-88-017-00 for Waterford Steam Electric Station Unit 3. This Licensee Event Report is submitted pursuant to 10CFR50.73(a)(2)(i).

Very truly yours,

7) flan

N.S. Carns Plant Manager - Nuclear

NSC/WMC:rk

Attachment

cc: R.D. Martin, NRC Resident Inspectors Office, INPO Records Center (J.T. Wheelock), E.L. Blake, W.M. Stevenson, D.L. Wigginton

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