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)
Peach Bottom Atomic Power Station - Unit 3	0 5 0 0 0 2 7 8	1 OF 0 4

TITLE (4)
Technical Specification Violations Concerning Inoperable Mechanical Snubbers.

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 0 0
1 1	0 1	8 5	8 5	- 0 2 5	- 0 0	1 2	2 3	8 5		0 5 0 0 0

OPERATING MODE (9)	N	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(a)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(a)(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
	AREA CODE
W. C. Birely, Senior Engineer, Licensing Section	2 1 5 8 4 1 1 - 5 1 0 4 8

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)

Abstract: 3-85-25

On November 22, 1985, with Unit 3 shutdown for a refueling outage, it was determined that fuel had been loaded into the reactor vesel with the Control Rod Drive (CRD) system administratively inoperable. This condition was not in compliance with Technical Specification 3.1.A which requires the Reactor Protection System to be operable with fuel in the reactor and the mode switch in 'Refuel'. The CRD system was administratively inoperable due to the failure of five CRD snubbers during functional testing earlier in the outage. Technical Specification 3.11.D.3 requires that the CRD system be considered inoperable pending repair of the snubbers and completion of an engineering evaluation on the CRD piping. Contrary to this requirement, the CRD system was not formally declared inoperable prior to fuel reload. Failure to specify this requirement in the snubber functional surveillance test was the cause of the Technical Specification violations. A safety evaluation performed subsequent to fuel load determined that the failed CRD snubbers had no adverse effects on the CRD piping. In the event that the scram system would have been required to perform its design function, inoperability of the subject snubbers would not have prevented this action. Therefore, this event had no adverse consequences.

Description of the Event:

On November 22, 1985, with Unit 3 shutdown for refueling, it was determined that two requirements of the Technical Specifications had not been met.

Background

Five mechanical snubbers on the Control Rod Drive (CRD) system were determined to be inoperable during surveillance testing performed earlier in the outage. These snubbers, which are located on the CRD pipe bundles in the drywell, were found to be rigid when they were removed for functional testing. The failures were discovered on the following dates:

Mechanical Snubber	Date of Failure
H-3LS-142-1	September 17, 1985
H-3LS-142-3	August 23, 1985
H-3LS-142-5	October 1, 1985
H-3LS-142-6	September 17, 1985
H-3LS-142-8	Sepember 17, 1985

Technical Specification 3.11.D.3 states that, "With one or more snubbers inoperable . . . ., within 72 hours, replace or restore the inoperable snubber to the operable status and perform an engineering evaluation per Specification 4.11.D.6. If these requirements cannot be met, declare the supported system inoperable and follow the applicable limiting condition for operation for that system". At the time that the snubber failures were discovered, the CRD system was already out-of-service in support of various outage-related work.

On November 1, 1985, when fuel loading commenced, the CRD system should have been considered inoperable under the requirements of Technical Specification 3.11.D.3 because the CRD snubbers had not been repaired and the evaluation of the failed CRD snubbers had not yet been performed. New snubbers were installed on November 4, 1985. On November 22, 1985, it was realized that the CRD system should have been considered inoperable and that Technical Specification 3.1.A had not been complied with during core reload. The piping system evaluation was performed satisfactorily on November 23, 1985.

Consequences of the Event:

As indicated by the results of an evaluation performed by Bechtel Corporation for the CRD snubbers (see "Corrective Actions"), there were no adverse consequences as a result of the inoperable snubbers. In the event that the scram system would have been required to perform its design function, inoperability of the subject snubbers would not have prevented this action.

Cause of the Event:

The cause of the Technical Specification violations was procedure inadequacy in that ST-13.48 (Mechanical Snubber Functional Test) did not indicate that the CRD system must be considered inoperable pending repair of the inoperable snubbers and completion of an engineering evaluation of the CRD piping. It should be noted that this was the first time that functional testing was performed on the CRD snubbers with Technical Specification 3.11.D.3 in effect.

Corrective Actions:

On November 22, 1985, Bechtel Corporation was requested to perform an evaluation to determine (1) mode of failure and (2) any adverse effects on the piping, for all Unit 3 snubbers determined to be inoperable during the current refueling outage. Highest priority was placed on the CRD snubbers. On November 23, 1985, Bechtel completed the evaluation of the CRD snubbers. The evaluation determined that the inoperability characteristics of the CRD snubbers did not impose loads which could have been detrimental to the attached piping or components and that the CRD system could be considered operable in accordance with Technical Specification 4.11.D.6.b.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Peach Bottom Atomic Power Station - Unit 3	0 5 0 0 0 2 7 8	8 5	— 0 2 5	— 0 0	0 4 OF 0 4

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

ST-13.48 and ST-13.31 (Hydraulic Snubber Functional Testing) have been revised to indicate that plant systems with inoperable snubbers must be considered inoperable until such snubbers are repaired or replaced and an engineering evaluation is performed on the supported piping.

Previous Similar Occurrences:

None.

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4000

December 23, 1985

Docket No. 50-278

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

SUBJECT: Licensee Event Report
Peach Bottom Atomic Power Station - Unit 3

This LER concerns failure to meet two requirements of the Technical Specifications regarding inoperable mechanical snubbers on the control rod drive system.

Reference:	Docket No. 50-278
Report Number:	3-85-25
Revision Number:	00
Event Date:	November 1, 1985
Discovery Date:	November 22, 1985
Report Date:	December 23, 1985
Facility:	Peach Bottom Atomic Power Station RD 1, Box 208, Delta, PA 17314

This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i).

Very truly yours,

W. T. Ullrich
Superintendent
Nuclear Generation Division

cc: Dr. Thomas E. Murley, Administrator, Region I, USNRC
T. P. Johnson, NRC Resident Inspector

IE22
1/1