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At 1000 hours on April 7, 1988, with Unit 2 at 100 percent power (Mode 1), it was discovered that the surveillance test for the Steam Generator (S/G) surface sample line outside containment isolation valve, TV-SS-212B had not been performed within the surveillance interval allowed by Technical Specification 4.0.5. Technical Specification 4.0.5 refers to A LE Section XI, which requires this valve to be stroked every three months. Since this valve had not been satisfactorily stroked since October 26, 1987, this event is reportable pursuant to 10CFR50.73(a)(2)(i)(B).

SUPPLEMENTAL REPORT EXPECTED 114

X NO

The cause for the missed surveillance has been attributed to personnel error. To prevent recurrence, program changes have been implemented to further assure that the surveillance requirements are met.

No adverse safety consequences resulted from this event because the capability to isolate the steam generator surface sample line containment penetration was not affected. The health and safety of the general public were not adversely affected at any time during this event.

MONTH

YEAR

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NAC Form 366A (9-83)	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION							N	V S. NUCLEAR REGULATORY COMMISSI APPROVED OMB NO. 3150-0104 EXPIRES: 8/31/88										
FACILITY NAME (1)				_		000	KET	NUM	BER ()		T	L	ER NUMBER	6)			AGE (1)
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1.0 Description of Event

At 1000 hours on April 7, 1988, with Unit 2 at 100 percent power (Mode 1), it was discovered that the surveillance test for the Steam Generator (S/G) surface sample line outside containment isolation valve, TV-SS-212B (EIIS System Identifier KN, Component Identifier ISV), had not been performed within the surveillance interval allowed by Technical Specification 4.0.5. Technical Specification 4.0.5, which refers to ASME Section XI, requires this valve to be stroked every three months. Since this valve had not been satisfactorily stroked since October 26, 1987, this event is reportable pursuant to 10CFR50.73(a)(2)(i)(B).

On January 4, 1988, TV-SS-212A failed to close from the control room on demand. As a result, TV-SS-212A was declared inoperable. Therefore, both TV-SS-212A and TV-SS-212B were closed and de-energized within four hours, as required by Technical Specification 3.6.3.1. These valves are the inside and outside containment isolation valves, respectively, for the S/G surface sample line. To ensure that TV-SS-212A would receive proper post-maintenance testing prior to being returned to service, the Shift Supervisor entered TV-SS-212A in the Action Statement Status Log.

Periodic Test 2-PT-213.10 controls the three month stroke time tests, as required by ASME Section XI, on 26 trip valves, including TV-SS-212A and TV-SS-212B. On January 27, 1988, 2-PT-213.10 was performed with satisfactory results on all of the valves except TV-SS-212A and TV-SS-212B, which were previously closed and de-energized in accordance with Technical Specification 3.6.3.1. At this time, the operator noted on the PT critique sheet that these two valves were not tested because they were both entered in the Action Statement Status Log, when in fact, only TV-SS-212A was entered. Periodic test 2-PT-213.10 was then appropriately classified as partially complete and accordingly reported to the Inservice Inspection Department (ISI).

On February 13, 1988, corrective maintenance was completed on TV-SC 212A. The valves and the associated penetration were then returned to service following successful post maintenance testing of TV-SS-212A. TV-SS-212B was not tested as required, because an Action Statement Status form was not prepared to alert operators that such a test was required. Periodic test 2-PT-213.10 was satisfactorily performed on all 26 valves on April 5, 1988.

NRC Form 366A (9-83)	L	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION APPRO							EGULATORY COMMISSION OMB NO. 3150-0104 31-86														
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On April 7, 1988, as a result of updating the valve stroke time log with the April 5, 1988, valve stroke time results from 2-PT-213.10, it was discovered that TV-SS-212B had been returned to service without having been tested within the allowed surveillance interval.

2.0 Safety Consequences and Implications.

No adverse safety consequences resulted from this event because both containment isolation valves were closed to assure isolation of the containment penetration from January 4, 1988, to February 13, 1988. Also, TV-SS-212B tested successfully on both October 26, 1987, and April 5, 1988, indicating that it remained functional during this period, and TV-SS-212A was fully operable from February 13, 1988, to the next surveillance test on April 5, 1988. Accordingly, the capability to isolate the steam generator surface sample line containment penetration was not affected. The health and safety of the general public were not adversely affected at any time during this event.

3.0 Causes of the Event

The cause for the missed surveillance has been attributed to personnel error. The operator incorrectly noted on the PT critique sheet that both TV-SS-212A and TV-SS-212B were in an Action Statement. The procedural controls for the Action Statement Status Log did not require separate entries to be made when a containment isolation valve becomes inoperable and the penetration has to be isolated. The actions required by 2-PT-213.10 for any valve that is not tested are not correctly located within the procedure and are not separated or otherwise delincated. Also, the Action Statement Status Log form does not include a specific section to annotate the Periodic test procedure number to be used to restore the equipment/system to service.

4.0 Immediate Corrective Action

As an immediate corrective action, a station Deviation Report was written to notify station management of this event.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION										NUCLEAR REGULATORY CO. MISS APPROVED OMB NO 3150-0104 EXPIRES: 8/31/88																
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5.0 Additional Corrective Action

As an additional corrective action, an Operations Directive was issued to require that when a containment penetration must be isolated due to an inoperable containment isolation valve, then both of the affected isolation valves will have separate Action Statement Status Log entries. This provision will ensure that each affected valve is independently addressed for surveillance requirements before being returned to service.

6.0 Actions Taken to Prevent Recurrence

Additional actions that will be taken to prevent recurrence of this type event include:

- All periodic test procedures controlling the stroke time testing of automatic containment isolation valves for both units will be reviewed and revised as necessary to ensure that the requirements of the above Operations Directive are incorporated into separate steps.
- o The Action Statement Status Log form will be revised to include a specific section for entry of the periodic test to be used to restore the equipment/system to service.

7.0 Similar Events

Previous reportable events concerning a pump or valve missed surveillance are provided below:

Unit 1		Unit 2
LER 80-094-00):	LER 84-004-00
LER 80-041-00)	
LER 83-015-00)	
LER 83-022-00)	
LER 85-002-00)	
LER 88-009-00	5	
LER 88-015-00)	
LER 88-017-00)	



VIRGINIA ELECTRIC AND POWER COMPANY

P. O. BOX 402
MINERAL, VIRGINIA 23117

May 3, 1988

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555 Serial No. N-88-018 % /GHF: nih Docket No. 50-339

Licensa No. NPF-7

Dear Sirs:

The Virginia Electric and Power Company hereby submits the following Licensee Event Report applicable to North Anna Unit 2.

Report No. LER 88-019-00

This report has been reviewed by the Station Nuclear Safety and Operating Committee and will be forwarded to Safety Evaluation and Control for their review.

Very Truly Yours,

M Burling

for G. E. Kane

Station Manager

Enclosure

cc: U. S. Nuclear Regulatory Commission 101 Marietta Street, N. W. Suite 2900 Atlanta, Georgia 30323

> Mr. J. L. Caldwell NRC Senior Resident Inspector North Anna Power Station

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