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On 4/5/88, a revision of the Train B Containment Isolation Valve Trip Test was being prepared in order to correct typographical During the pre-revision review, it was discovered that errors. there were three Fire Protection valves which received a Train B Containment Isolation Phase A (CIA) signal to close which were not included in this test. A procedure revision was immediately initiated to include these valves in this test. A special procedure was initiated to verify these valves will stroke closed upon receiving a CIA signal. Additional review verified that all other CIA valves were fully tested. The three valves were verified to be in the quarterly stroke test verifying manual operability and ability to stroke. Investigation determined that valves were, when installed in 1982, correctly added to the Technical Specifications requiring testing. The valves were not added to the testing program due to personnel error by the involved procedure engineer. Since 1982, Beaver Valley has initiated a formal, structured, pre-design change procedure review to insure that all procedure changes required by a design change are performed. There were minimal safety implications due to this event as the valves were tested to verify manual operability this event and were normally maintained in a throughout closed/fail-safe position.

NRC Form 386

YES I'M yes complete EXPECTED SUBMISSION DATE

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

NRC	Form	266.4
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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

	Valley Power Station - Unit 1													EX	PIRES	8/31/				
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On 4/5/88, a revision of the Train B Containment Isolation Valve Trip Test was being prepared in order to correct typographical errors. During the pre-revision review, it was discovered that their were three Containment Isolation Phase A (CIA) valves which were not included in the test. The Containment Fire Protection Header Isolation Valves, [TV-FP-105, 106 and 107], were installed in 1982 under a design change. A Train B CIA signal will send a close signal to these valves. These valves are normally closed and receive no automatic open signals.

After this deficiency was discovered, a procedure revision was immediately initiated to add these valves to this test. A special procedure was initiated to verify these valves will stroke closed upon receiving a Train B CIA signal. (These valves do not receive a Train A CIA signal). It was verified that, while these three valves were not in the quarterly test that verifies they will close when stroked from the benchboard. Additional review

verified that 11 other CIA valves were fully tested.

These valves were installed in 1982 as part of an extensive Fire Protection Design Change. These valves were added to the Technical Specification for Containment Isolation Valves at that Investigation determined that the valves were omitted from the testing procedure due to personnel error on the part of the procedure engineer responsible for altering the surveillance procedures to reflect the design and Technical Specifications After the Design Change was completed and its associated Technical Specification Change approved, the Licensing Group notified potentially affected station groups, requesting they initiate procedure changes as required. The engineer responsible for updating Surveillance Testing Procedures responded with a list of procedures which would be revised. The test for Containment Isolation Valves was not on the list to be updated. In order to determine if similar errors had occurred on other procedures, a "spot check" of Design Changes completed between 1980 and 1982 was performed Of the 127 design changes completed in this time frame, 44 were reviewed. No procedural deficiencies were identified from this sample.

Beaver Valley has made extensive changes to its design changes related procedure review process in the last 6 years. In 1982, the Procedures group would frequently not be aware of the full scope of a design change until it was completed and the associated Technical Specification Amendment (if any) approved. Currently, potentially affected groups, including the Procedures group and the Inservice Testing (IST) group are involved in the Design Concept review, before the design change is even initiated. Both these groups have formal procedures and checklists to identify potential procedure/IST changes due to design changes. These procedures, which did not exist at the time these Fire Protection valves were installed, serve to prevent human errors similar to

this event's.

TEXT (If more space is required, use additional NAC form 3664's) (17)

There were no major safety implications due to this event. The valves had been verified capable of stroking on a quarterly basis since they were installed. The valves are maintained in a closed (safe) position and are only opened for testing or in the event of a fire in Containment. A review of station records has shown that there have been no fires in the Containment Building since the installation of these valves. There are check valves in Containment, downstream, of these trip valves. These check valves would have provided a second isolation boundary in the event that the header isolation valves failed to close. In the event that a CIA occurred, the Stations Emergency Procedures instruct the operators to verify these valves position and close them, if necessary.





Nuclear Group P.O. Box 4 Shippingport, PA 15077-0004

> May 5, 1988 ND3SPM:0212

Beaver Valley Power Station, Unit No. 1 Docket No. 50-334, License No. DPR-66 LER 88-005-0

United States Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

Gentlemen:

In accordance with Appendix A, Beaver Valley Technical Specifications, the following Licensee Event Report is submitted:

LER 88-005-00, 10 CFR 50.73.a.2.i.B.," Containment Isolation Valves Omission from Surveillance Testing".

Very truly yours,

T. P. Noonan Plant Manager

pjc

Attachment

1E22

May 5, 1988 ND3SPM:0212 Page two

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