NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION (4-95)						•	APPROVED BY OMB NO. 3150-0104 EXPIRES 04/30/98								
LICENSEE EVENT REPORT (LER)							ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, ANI TO THE PARERWORK REDUCTION INDUSTOR.						THIS DRTED ENSING MMENTS AND UCLEAR 0001, AND		
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EVE	NT DA	TE (5)	LER	NUMBER	(6)	REPOR	TDATE	E (7)		ter terminent in a manner, of class	OTHER	FACILITIES !	INVOLVED	(8)	*****
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			20.220	)3(a)(2)(i)		20.23	203(a)(4	)			50.73(a)(2	)(v)		OTHE	R
			20.220	(a)(2)(ii)		50.36	5(c)(1)				50.73(a)(2	)(vii)			
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			20.220	3(a)(2)(v)		50.73	3(a)(2)(ii	i)	50.73(a)(2)(x)		NRC	NRC Form 366A)			
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines 16)

During setpoint verification testing of Unit One Main Steam Safety Valves (MSSVs), 5 valves lifted in excess of their setpoints by greater than the 3% Technical Specification tolerance. Following the identification of the test failures, the appropriate Limiting Condition of Operation Action Requirement (LCOAR) was entered in each case. The valves were adjusted as necessary and retested to place them in the accepted tolerance range prior to exiting the LCOARs.

The root cause of the MSSV test failures has not yet been determined, however a suspected cause of the high initial lift phenomenon is associated with metallic bonding between the disc and nozzle seats caused by differences in the coefficient of expansion between the disc and the nozzle. The investigation is on-going and a supplement to this report will follow when additional information is obtained.

Corrective actions include further evaluating a disc removed from one of the valves and reviewing historical data to assess the cause of the test failures. An evaluation of the safety consequences concluded that the acceptance criteria for the applicable Updated Final Safety Analysis Report (UFSAR) accident scenarios were not exceeded. This event is being report of pursuant to 10CFR50.73(a)(2)(i)(B).

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION		ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THE INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTE LESSONS LEARNED ARE INCORPORATED INTO THE LICENSI PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMI REGARDING BURDEN ESTIMATE TO THE INFORMATION AN RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, TO THE PAPER WORK REDUCTION PROJECT			LY WITH THIS RS. REPORTED THE LICENSING (ARD COMMENTS RMATION AND S. NUCLEAR 2 20555-0001, AND	
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(If more space is required, use additional copies of NRC Form 366A)(17)

# A. PLANT CONDITIONS PRIOR TO EVENT:

Unit(s): 01	Event Date: 9/3/98	Event Time: 0456 HOURS
Reactor Mode(s): 01	Power Level(s): 072	RCS [AB] Temp./Press. NOT / NOP

### B. DESCRIPTION OF EVENT:

There were no systems or components inoperable at the beginning of this event that contributed to the severity of the event.

This event is being reported pursuant to 10CFR 50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications."

On September 3, 1998, setpoint verification testing (Trevitesting) of 20 Unit 1 Main Steam (SB) Safety Valves (MSSVs) was initiated. The MSSVs are tested individually during each cycle as part of the station's In-Service Testing (IST) Program. The IST Program requires testing of 20% of the valves (4 valves), however the station routinely tests all 20 valves. The tests verify that the actual MSSV lift settings are in accordance with Technical Specification 3/4.7.1.1, Table 3.7-2. The Technical Specifications allow a +/- 3% tolerance on the as found lift setting, but require all tested valves to be set to +/- 1% in the as left condition. The test determines each valve's actual lift setting using normal system pressure with assistance from a hydraulic testing device.

Results from the Trevitesting revealed that 5 out of 20 valves lifted in excess of their setpoints by greater than the 3% Technical Specification tolerance. The specific valves and the amount the valves lifted in excess of the setpoint are; 1MS014B (+7.5%), 1MS016B (+9.7%), 1MS017C (+6.1%), 1MS016D (+7.5%), and 1MS014D (+7.8%).

Following the identification of the valve test failures, Limiting Condition of Operation Action Requirement (LCOAR) 7.1.1-1a, "Plant Systems Turbine Cycle Test Valves," was entered for each valve failure. Second lift tests were performed on each valve prior to performing any adjustments and all lifted within the 3% Technical Specification limit. The valves were subsequently adjusted as needed and additional lift tests were performed until the requirements stated in the station's procedure, BwMP 3305-107, "Main Steam Safety Valves Lift Point Verification Using the Furmanite Trevitest System," were satisfied (two consecutive lift tests within +/- 1% of the required setpoint). Following the successful execution of the testing, the LCOARs were exited for each valve.

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## C. <u>CAUSE OF EVENT:</u>

The root cause of the MSSV failures has not yet been determined, however industry experience has shown that the high initial lift phenomenon may be due to metallic bonding between the disc and nozzle seats caused by differences in the coefficient of expansion between the disc and the nozzle. The investigation of the high initial lift phenomenon is on-going and a supplement to this report will follow when additional information is obtained.

#### D. ASSESSMENT OF SAFETY CONSEQUENCES:

The primary purpose of the MSSVs is to provide overpressure protection for the secondary system. These values also provide protection against over-pressurizing the reactor coolant pressure boundary by providing a heat sink for the removal of energy from the Reactor Coolant System (RCS) if the preferred heat sink, provided by the Condenser (SD) and Circulating Water (KE) System, is not available.

The design basis for the MSSVs is to limit the secondary system pressure to S110% of design pressure for any Anticipated Operational Occurrence (ACO), or accident considered in the Design Basis Accident and transient analysis. The events that challenge the relieving capacity of the MSSVs, and thus RCS pressure, are those characterized as decreased heat removal events, which are presented in the Updated Final Safety Analysis Report (UFSAR), Section 15.2. Of these, the full power turbine trip without steam dump is the limiting AOO with respect to secondary system pressure. This Loss of Load event along with the Small Break LOCA and Spurious SI events were evaluated by ComEd's Nuclear Fuels Management (NFM) group utilizing AIRO7 Trevitest data. The evaluation indicated that the acceptance criteria for the above-mentioned events were not exceeded.

#### E. CORRECTIVE ACTIONS:

An evaluation of the recent Trevitest data was performed by Nuclear Fuels Management. This evaluation concluded that the acceptance criteria for the applicable UFSAR accident scenarios were not exceeded.

Five valves, four of which had initial valve lifts within the 3% criteria, were rebuilt during the current refueling outage (A1R07). The fifth valve, 1MS016B, is one of the population exhibiting a high initial lift setting. An on-site representative from Consolidated Dresser, Incorporated, the valve manufacturer, will perform the lapping of the valve surfaces to ensure they are reconditioned as required. The disc from 1MS016B and a disc from one of the other four valves (to be used as a comparison) will be further evaluated. The results from this evaluation will be assessed to validate the industry experience. This action

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was assigned a due date of 2/15/99 (NTS#45618098SCAQ0004A03).

A review of past MSSV rebuild work packages, procedure revisions, and differences between Braidwood and Byron MSSV maintenance practices will be conducted to assess whether these factors could have contributed to the MSSV test failures. Based on this review, changes will be incorporated into the rebuild procedure. This action is scheduled for completion by 3/1/99 (NTS#45618098SCAQ0004A04).

A supplemental report is expected to be submitted by June 28, 1999, following the evaluation of the investigation results and other industry developments (NTS#45618098SCAQ0004A08).

### F. PREVIOUS OCCURRENCES:

Test failures were encountered during previous outages at Braidwood Station. Following the identification of these failures, all of the valves were successfully set to within +/- 1% of the Technical Specification requirements.

# G. <u>COMPONENT FAILURE DATA:</u>

MANUFACTURER	NOMENCLATURE	MODEL	MFG. PART NO
Dresser	Main Steam Safety Valve (MSSV)	3707R	