

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) PLANT HATCH, UNIT 1	DOCKET NUMBER (2) 0 5 0 0 0 0 3 2 1	PAGE (3) 1 OF 0 5
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TITLE (4)
DEFICIENT PROCEDURE CAUSES MISSED TECH. SPEC. SURVEILLANCE ON HPCI VALVES

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)
08	17	88	88	008	00	09	08	88			0 5 0 0 0 0
DOCKETS INVOLVED (8)											
0 5 0 0 0 0											

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §. (Check one or more of the following) (11)									
POWER LEVEL (10) 1,0,0	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)						
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)						
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)						
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)							
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)							
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)								

LICENSEE CONTACT FOR THIS LER (12)

NAME Steven B. Tipps, Manager Nuclear Safety and Compliance, Hatch	TELEPHONE NUMBER AREA CODE: 9 1 2 NUMBER: 3 6 7 - 7 8 5 1
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14) <input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH: DAY: YEAR:
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On 08/17/88 at approximately 0800 CDT, Unit 1 was in the RUN mode at approximately 100 percent of rated thermal power. At that time, Procedure Upgrade Program (PUP) personnel reported that the frequency for operability testing of two High Pressure Coolant Injection system motor operated valves (1E41-F006 and 1E41-F007) was not in compliance with the requirements of Unit 1 Technical Specifications, section 4.5.D.1.e. These valves were being tested per procedure 34SV-E41-001-1S "HPCI Valve Operability", at every cold shutdown, rather than once per month as required by the Technical Specifications.

The root cause of this event is a procedure deficiency. The HPCI valve operability testing procedure, HNP-1-3302, was erroneously revised on 7/1/79 in order to implement the then new ISI pump and valve testing plan. (Procedure HNP-1-3302 was replaced by procedure 34SV-E41-001-1S).

The corrective actions for this event included: 1) satisfactorily testing the HPCI pump discharge valves, 1E41-F006 and 1E41-F007, 2) revising procedure 34SV-E41-001-1S to reflect the correct surveillance frequency, and 3) reviewing other valve operability testing procedures to ensure that surveillance intervals are properly stated per the Technical Specifications.

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

Plant and System Identification:

General Electric - Boiling Water Reactor
Energy Industry Identification System codes are identified in the text as [XX].

Summary of Event

At approximately 0800 CDT on 08/17/88, it was determined that operability testing of the Unit One High Pressure Coolant Injection System (HPCI)[BJ] pump discharge and injection valves was not being performed once per month as required by the Technical Specifications. This occurred due to a deficient procedure. The valves were proven operable and a procedure change was initiated.

Description of Event

On 08/17/88 at approximately 0800 CDT, Procedure Upgrade Program (PUP) personnel reported that the frequency for operability testing of two High Pressure Coolant Injection (HPCI) Motor Operated Valves (1E41-F006 and 1E41-F007) was not in compliance with the Unit 1 Technical Specifications section 4.5.D.1.e. The valves were being tested per procedure 34SY-E41-001-1s (Rev 2), "HPCI Valve Operability", at every cold shutdown rather than once per month as required by the Technical Specifications.

PUP personnel requested that Nuclear Safety and Compliance personnel determine if the valves (1E41-F006 & 1E41-F007) should be tested monthly per the Technical Specifications or once per cold shutdown per the site In-Service Inspection (ISI) plan. PUP personnel were advised that the ISI plan did not supersede the Technical Specifications.

Operability testing of valves 1E41-F006 and 1E41-F007 was begun at approximately 1136 CDT on 08/17/88, and was satisfactorily completed by approximately 1145 CDT.

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TEXT (if more space is required, use additional NRC Form 365A's) (17)

Cause of Event

The root cause of this event is a deficient HPCI valve operability procedure. Procedure 34SV-E41-001-1S (which replaced procedure HNP-1-3301) did not state the correct frequency for testing to comply with the requirements of Unit One Technical Specifications, section 4.5.D.1.e.

Prior to July 1, 1979, procedure HNP-1-3302 required that the HPCI pump discharge valves be tested on a monthly basis. The ISI plan and the procedure were changed following a meeting with the Nuclear Regulatory Commission (NRC) held at Plant Hatch on February 22, 1979. At this meeting, the "Guidelines for Excluding Exercising (cycling) Testing of Certain Valves during Plant Operation" were discussed.

Georgia Power provided a basis for an exemption from ASME Section XI requirements to extend the test frequency for valves 1E41-F006 and 1E41-F007 to once per cold shutdown. The NRC subsequently approved the exemption request but stated that, "... where the updated program is less restrictive than particular Technical Specification requirements, the licensee must continue to comply with the Technical Specifications until he requests and is issued a Technical Specification change."

On June 6, 1979, the revised In-Service Inspection plan, with the change of stroke time testing frequency for valves 1E41-F006 and 1E41-F007, was submitted to the NRC for review and approval.

On July 1, 1979, procedure HNP-1-3302 was revised to reflect the frequency shown in the ISI program yet no Technical Specification change was ever requested.

Subsequent revisions to the procedure did not identify the previous oversight until the procedure was upgraded in August, 1988.

Reportability Analysis and Safety Assessment

This report is required per 10 CFR 50.73 (a)(2)(i)(B), because a condition existed that was prohibited by the plant's Technical Specifications.

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The requirements, as stated in the Unit 1 Technical Specifications, section 4.5.D.1.e, assure the operability of HPCI pump discharge and injection valves by prescribing the surveillances at defined intervals to check the valves' functional capabilities and stroke times. In this event, portions of HPCI system were not tested in accordance with these requirements. Specifically, the pump discharge valve, 1E41-F007 and the injection valve, 1E41-F006, were tested at every cold shutdown instead of once monthly.

A review of surveillance data packages from 1979 through the present revealed that the valves passed their stroke time testing per the requirements of 34SV-E41-001-1S.

Based on the above information it is concluded that this event had no adverse impact on nuclear safety. Additionally, while this event occurred when Unit 1 was at full power operation, the above analysis is applicable to all power levels and operating modes.

Corrective Action

The corrective actions for this event included:

1. Satisfactory completion of valve operability testing, per requirements of procedure 34SV-E41-001-1S, (Rev 2), of valves 1E41-F006 and 1E41-F007 on 08/17/88.
2. Upgrading procedure 34SV-E41-001-1S (Rev. 2) to ensure compliance with the Unit 1 Technical Specification (section 4.5.D.1.e). The upgraded procedure will be approved and issued by 10/11/88.
3. Valve operability procedures for the High Pressure Coolant Injection, Core Spray, Residual Heat Removal and Reactor Core Isolation Cooling systems for both Hatch Units 1 and 2 were reviewed to ensure Technical Specification compliance. No discrepancies other than those described in this report were identified.

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

Additional Information

1. Failed Component(s) Identification

There was no component failure experienced in this event.

2. Previous Similar Events

There have been six events similar to the one described in this LER. They were reported in the following LERs:

50-336/1986-004(2/28/86), 50-366/1986-006(4/18/86),
50-366/1988-002(3/18/86), 50-366/1988-012(5/23/88),
50-366/1988-014(5/26/88 and 50-366/1988-016(6/22/88).

These LERs describe events where inadequate procedure caused untimely (non-Tech Spec) surveillance/operability testing of plant equipment. The plant equipment involved was: (1) Fire Detection Equipment, (2) Hydraulic Shock and Sway Arrestors, (3) Reactor Protection Circuitry, (4) Supply and Exhaust dampers in the Reactor Building and Refueling Floor Normal Ventilation Systems, (5) Main Steam Isolation Valve and Turbine Stop Valve Closure logic and (6)

In all cases, the corrective actions were: (1) to upgrade the procedure or develop a temporary procedure and (2) to test the plant equipment for compliance with the Technical Specification.

However, the corrective actions for the similar events would not have prevented the event described by LER 50-321/1988-008 because the procedure in question had not yet been upgraded.

The long term corrective actions to identify and prevent these sorts of events is PUP. In all of the events discussed herein, PUP personnel identified the procedure inadequacy. This detection testifies to the effectiveness of the program. While the events are reportable per the requirements of 10 CFR 50.73, long term corrective actions were in progress to detect and correct procedure deficiencies.

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Nuclear Operations

the southern electric system

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September 8, 1988

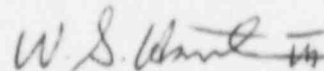
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ATTN: Document Control Desk
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PLANT HATCH - UNIT 1
NRC DOCKET 50-321
OPERATING LICENSE DPR-57
LICENSEE EVENT REPORT
DEFICIENT PROCEDURE CAUSES MISSED
TECH. SPEC. SURVEILLANCE ON HPCI VALVES

Gentlemen:

In accordance with the requirements of 10 CFR 50.73(a)(2)(i), Georgia Power Company is submitting the enclosed Licensee Event Report (LER) concerning an event where a surveillance was missed. This is a condition prohibited by the plant's Technical Specifications. This event occurred at Plant Hatch - Unit 1.

Sincerely,



W. G. Hairston, III

CLT/ct

Enclosure: LER 50-321/1988-008

c: (see next page)

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U. S. Nuclear Regulatory Commission
September 8, 1988
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c: Georgia Power Company

Mr. W. C. Nix, General Manager - Plant Hatch
Mr. L. T. Gucwa, Manager Licensing and Engineering
GO-NORMS

U. S. Nuclear Regulatory Commission, Washington, D. C.
Mr. L. P. Crocker, Licensing Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II
Dr. J. N. Grace, Regional Administrator
Mr. J. E. Menning, Senior Resident Inspector - Hatch