

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Seabrook Station		DOCKET NUMBER (2) 0 5 0 0 0 4 4 3	PAGE NO. 1 OF 0 2
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TITLE (4)
Technical Specification Surveillance Requirement Not Satisfied Due To Procedure Inadequacy

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	1 4	8 7	8 8	0 0	6	0 9	0 7	8 8			0 5 0 0 0 0
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)											

OPERATING MODE (9) 3	20.402(b)	20.40b(c)	50.73(a)(2)(iv)	72.71(b)
POWER LEVEL (10) 0 1 0 0	20.405(a)(1)(ii)	50.36(e)(1)	50.73(a)(2)(v)	72.71(c)
	20.405(a)(1)(iii)	50.36(e)(2)	50.73(a)(2)(vi)	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)(ix)	

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER	
NAME Robert A. Gwinn Senior Engineer (ext. 4056)		AREA CODE 6 0 3	NUMBER 4 7 4 - 9 5 7 4

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)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)		<input checked="" type="checkbox"/> NO			

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen 1/4 space typewritten lines) (16)

On August 18, 1988, during a review of instrument loop surveillance procedures, it was identified that certain procedures do not fully test components required to maintain the Reactor Coolant System (RCS) Cold Overpressure Mitigation System (COMS) operable. The untested components, auxiliary and isolation relays, are not included as part of the present surveillance test procedure, and are not functionally verified operable in any other surveillance procedures. A review was performed and a determination made that initial preoperational testing, performed on June 29, 1985, provided relay operability through May 14, 1987. After that date the PORVs should have been declared inoperable, and other actions taken to provide cold overpressure protection. However, COMS operability was relied upon for cold overpressure protection from May 11, 1987, until May 28, 1987, at which time the 1.58 square inch pressurizer vent valve was opened. Plant conditions during this period were MODE 5, pressurizer level 60 percent, and a nitrogen gas bubble in the pressurizer.

A change to plant procedures will be made to insure that the bistable output relays are tested thus fulfilling the surveillance requirements for both the loop calibration and monthly analog channel operational test activities.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Seabrook Station	DOCKET NUMBER (2) 0 5 0 0 0 4 4 3	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		8 8	- 0 0 6	- 0 0	0 2	OF 0 2

TEXT (If more space is required, use additional NRC Form 305A's.)

On August 18, 1988, it was identified that instrumentation surveillance procedures IX1662.313, IX1662.314, and IX1662.390 did not test certain auxiliary and isolation relays that are required in order to declare the Reactor Coolant System Cold Overpressure Mitigation System (COMS) operable. The COMS signal provides arming and automatic opening to the Power Operated Relief Valves (PORVs) should a Reactor Coolant System low temperature overpressure condition develop. The current surveillance procedures test the loop through the instrument output bistables. Due to plant design, auxiliary and isolation relays are required for COMS actuation of the PORVs. This oversight resulted in the COMS actuating circuits exceeding their surveillance window on May 14, 1987. From May 14, 1987 to May 28, 1987, when the manual pressurizer 1.58 square inch vent was opened and locked open, plant conditions relied upon the COMS actuation signal to the PORVs for Reactor Coolant System low temperature overpressure protection. The reliance on equipment that had not been demonstrated operable is being reported pursuant to 10CFR50.73.2.1.B.

PLANT CONDITIONS

The unit entered MODE 5 on March 20, 1987, with system temperature maintained between 115 and 135 degrees Fahrenheit and the pressurizer pressure initially vented through two three-quarter inch globe valve high point vents. On April 10, 1987, the pressurizer high point vents were shut and a wide range RCS pressure of approximately 20 psig developed. Throughout this period both Residual Heat Removal (RHR) trains were operable providing backup overpressure protection. On May 11, 1987, RHR Train A was removed from service for maintenance, and until May 28, 1987, when the pressurizer 1.58 square inch vent valve was opened, the only RCS overpressure protection was the RHR Train B inlet relief valve.

SAFETY SIGNIFICANCE

Although Technical Specifications require either two operable PORVs or two RHR inlet relief valves, there is sufficient design justification to show that a single RHR inlet relief valve is adequate to prevent system overpressurization. The most severe credible overpressure transient is the mass input resulting from one centrifugal charging pump operating in an unthrottled condition with flow to the Reactor Coolant System while letdown flow is isolated. The capacity of a single RHR inlet relief valve is sufficient to satisfy overpressure requirements for this transient during the hot shutdown and cold shutdown operational modes. Procedures and administrative controls insure that more severe RHR overpressure transients do not occur during RHR operation. Since it is possible that the plant may operate in the cold shutdown mode for an extended period of time, the RHR inlet relief valve capacity has been verified sufficient to provide overpressure protection during this mode for the mass input transient resulting from two centrifugal charging pumps operating in an unthrottled condition with flow to the RCS while letdown flow is isolated. Based upon the above information there are no plant safety concerns as a result of the incomplete surveillance testing regarding RCS overpressure protection while in MODE 5.

CORRECTIVE ACTIONS

A change to plant surveillance procedures will be made to prevent recurrence of this condition.



George S. Thomas
Vice President-Nuclear Production

Public Service of New Hampshire

New Hampshire Yankee Division

NYN-88125

September 15, 1988

United States Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Reference: (a) Facility Operating License No. NPF-56,
Docket No. 50-443

Subject: License Event Report (LER) No. 88-006-00: Technical Specification
Surveillance Requirement Not Satisfied Due to Procedure Inadequacy

Gentlemen:

Enclosed please find Licensee Event Report (LER) No. 88-006-00 for
Seabrook Station. This submittal documents an event which was identified on
August 18, 1988, and is being reported pursuant to 10 CFR 50.73(b)(2)(i).

Should you require further information regarding this matter, please
contact Mr. R. A. Gwinn at (603) 474-9574, extension 4056.

Very truly yours,

George S. Thomas
George S. Thomas

Enclosures: NRC Forms 366, 366A

cc: Regional Administrator
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