

### LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <b>Ferri 2</b>	DOCKET NUMBER (2) <b>0 5 0 0 0 3 4 1 1</b>	PAGE (3) <b>1 OF 0 3</b>
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TITLE (4)  
**Failure to Perform Accelerated Valve Stroke Time Testing as Required by ASME**

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 8	1 5	8 8	8 8	0 3 1	0 0	0 9	1 4	8 8	N/A	0 5 0 0 0
									N/A	0 5 0 0 0

OPERATING MODE (9) **1**

POWER LEVEL (10) **0.719**

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)

<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)(ii)	<input type="checkbox"/> 50.38(a)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(a)
<input type="checkbox"/> 20.405(a)(1)(iii)	<input type="checkbox"/> 50.38(a)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
<input type="checkbox"/> 20.405(a)(1)(iv)	<input checked="" type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(vii)(A)	
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 50.73(a)(2)(vii)(B)	
<input type="checkbox"/> 20.405(a)(1)(vi)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME: **Patricia Anthony, Compliance Engineer**

TELEPHONE NUMBER: **3 1 3 5 8 6 - 1 6 1 7**

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)  NO

EXPECTED SUBMISSION DATE (15): MONTH  DAY  YEAR

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

On August 15, 1988, it was discovered that the High Pressure Coolant Injection System discharge isolation valve, E41-F067, had not been placed on an accelerated stroke time test frequency. The valve had experienced a 36% increase in stroke time in June. According to ASME Code Section XI IWV-3417, the valve stroke time test frequency is required to be increased to once a month if the valve stroke time changes by 25% or greater. The stroke time testing was not performed in July as required by ASME Code since this increase was not noted.

The valve was successfully tested on August 16 with a stroke time that did not exceed the 25% action level from the May of 1988 stroke time. It has been placed on the Inservice Testing Pump and Valve Out-of-Specification Report so that testing will continue on the proper frequency.

The individual who failed to identify the need for increased testing during the inservice testing review was counseled about his performance. Two inservice testing procedures will be revised to further refine the review of testing data.

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					YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
					88	031	00	02	OF	03

TEXT IF more space is required, use additional NRC Form 288A's (17)

Initial Plant Conditions:

Operational Condition: 1 (Power Operation)  
 Reactor Power: 79%  
 Reactor Temperature: 530 degrees Fahrenheit  
 Reactor Pressure: 969 psig

Description of Event:

On August 15, 1988, it was discovered that the stroke time for the High Pressure Coolant Injection System (HPCI) (BJ) turbine steam isolation valve (ISV), E41-F067, had increased from 15 seconds on May 8, 1988 to 20.4 seconds on June 10, 1988 during a review of valve stroke time testing for trending. This represents a 36% increase in valve stroke time. The testing of this valve occurred following preventative maintenance on the HPCI turbine in June. The HPCI Pump Operability and Flow Test at 1000 psig and Valve Operability Test was performed to prove pump operability and resulted in the testing of E41-F067. This test pressurizes the hydraulic operator and manually strokes the valve.

The American Society of Mechanical Engineers (ASME) Code Section XI IWV-3417 requires increasing the testing frequency to once a month when a valve's stroke time increases by 25% or more. This increase was not identified during the inservice inspection review that was initially performed.

The increase was not noticed until the review of the package in August and therefore, the valve was not placed in the Inservice Testing Pump and Valve Status Report in order to perform the accelerated testing as required in July.

The valve was tested on August 16, 1988. During that test, the valve stroked open in 14.0 seconds. No apparent reason for the decrease in stroke time has been identified. Based on past data, the average stroke time for this valve is 14.9 seconds. The Technical Specification allowable stroke time for this valve is 23 seconds.

Cause of Event:

The event was caused by the failure of a knowledgeable individual (utility non-licensed) to perform activities in order to maintain compliance with the ASME Code. Additionally, procedure 41.000.22, "Inservice Testing Program for Pumps and Valves-Implementation and Control", provided inadequate directions for the analysis and manual trending of valve stroke time testing data.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
			0 3 1	0 1 0	0 3	OF	0 3

TEXT of more space is required, use additional NRC Form 208A's (17)

Analysis of Event:

During this period of time, the stroke time of E41-F067 was always within the allowable stroke time given in Technical Specifications. Therefore, HPCI was capable of performing its design basis function during this time frame although the accelerated test frequency had not been established as required by the ASME Code.

Corrective Action:

The individual involved in this event has been counseled about the deficiencies in his performance.

In order to ensure E41-F067 is tested on the proper frequency, it was placed on the Inservice Testing Pump and Valve Out-of-Specification Status Report. The pump and valve data files have been verified and no other errors existed.

Procedure 12.000.061, "Inservice Testing Program for Pumps and Valves" will be revised by October 3, 1988. This revision will establish a requirement for performing the data analysis to identify possible increased testing frequency within seven working days of performance of the test. Procedure 41.000.22 will also be revised to address the use of the Inservice Testing Valve Stroke Time Trending Data Sheet by October 3, 1988. Any discrepancies between the time allowed for data analysis between procedures 12.000.061 and 41.000.22 created by the revisions will be resolved at that time.

Previous Similar Events:

This is the first Licensee Event Report submitted describing the failure to perform ASME required accelerated testing.

Detroit  
Edison

William S. Orser  
Vice President  
Nuclear Operations

Fermi 2  
6400 North Dixie Highway  
Newport, Michigan 48166  
(313) 586-5300

10CFR50.73



Nuclear  
Operations

September 14, 1988  
NRC-88-0213

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Reference: Fermi 2  
NRC Docket No. 50-341  
Facility Operating License No. NPF-43

Subject: Licensee Event Report (LER) No. 88-031-00

Please find enclosed LER No. 88-031-00, dated September 14, 1988, for a reportable event that occurred on August 15, 1988. A copy of this LER is also being sent to the Regional Administrator, USNRC Region III.

If you have any questions, please contact Patricia Anthony at (313) 586-1617.

Sincerely,



Enclosure: NRC Forms 366, 366A

cc: A. B. Davis  
J. R. Eckert  
R. C. Knop  
T. R. Quay  
W. G. Rogers

Wayne County Emergency  
Management Division

JEZ  
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