

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1): **JAMES A. FITZPATRICK NUCLEAR POWER PLANT** DOCKET NUMBER (2): **050003333** PAGE (3): **1 OF 04**

TITLE (4): **Pipe supports not installed following maintenance as a result of failing to properly implement written procedures**

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	16	88	88	007	00	09	14	88			05000
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §. (Check one or more of the following) (11):											

OPERATING MODE (9): N	20.402(b)	20.406(c)	80.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10): 0.84	20.406(a)(1)(ii)	80.36(a)(1)	80.73(a)(2)(v)	73.71(a)
	20.406(a)(1)(iii)	80.36(a)(2)	80.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	20.406(a)(1)(iv)	<input checked="" type="checkbox"/> 80.73(a)(2)(i)	80.73(a)(2)(vii)(A)	
	20.406(a)(1)(v)	80.73(a)(2)(ii)	80.73(a)(2)(vii)(B)	
	20.406(a)(1)(vi)	80.73(a)(2)(iii)	80.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12):

NAME: **W. VERNE CHILDS, SENIOR LICENSING ENGINEER** TELEPHONE NUMBER: **315 349-6305**

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 you complete EXPECTED SUBMISSION DATE): NO: EXPECTED SUBMISSION DATE (15):

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

IIIS Codes are in []

During normal plant operation on 8/16/88 at 84% of rated power, an NRC inspector found a pipe support not installed. On 8/17/88, plant personnel found a second support also not installed. Both supports for Residual Heat Removal (RHR)/Low Pressure Coolant Injection (LPCI) [BO] pump minimum flow lines were installed about 3 hours after discovery. The pipe support had not been attached to the piping since maintenance was performed between 1/10/88 and 1/27/88.

Subsequent system stress analysis indicates both minimum flow lines were fully operable without the pipe supports.

The event was caused by failure to properly implement procedures required by Technical Specification 6.8.A.

Corrective action included installation of the supports and stress analysis of systems. In addition, professional and supervisory staff responsibilities to provide adequate instructions, in-progress inspection, and post-work inspection will be reinforced.

There have been no similar LERs involving supervisory failure to properly implement existing procedures.

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TEXT (if more space is required, use additional NRC Form 388A's) (17)

Description of Event

On August 16, 1988 at 1430 hours during normal plant operation at 84% of rated power, an NRC inspector noted that a pipe support for Residual Heat Removal (RHR)/Low Pressure Coolant Injection (LPCI) [BO] pumps B and D minimum flow line was not attached to the minimum flow line. RHR/LPCI pumps B and D were declared inoperable, surveillance testing required by Technical Specification 4.5.A.3.a was initiated, and work was started to properly install the pipe support. The pipe support was completely installed and inspected at 1733 hours. This action restored RHR/LPCI pumps B and D to an operable status.

During investigation of the event, walkdown of both RHR/LPCI loops A and B was conducted. During this investigation on August 17, 1988, at 1030 hours, plant personnel discovered that a similar pipe support for RHR/LPCI pumps A and C minimum flow line was also not attached to the minimum flow line. RHR/LPCI pumps A and C were declared inoperable, surveillance testing required by Technical Specification 4.5.A.3.a was initiated, and work was started to properly install the pipe support. RHR/LPCI pumps A and C were made operable at 1410 hours on August 17, 1988, when the installation of the pipe support was completed.

Cause of Event

A review of records was conducted to determine why and when the pipe supports were removed and not properly installed after completion of work that required the removal of the pipe supports. Records indicate that during a maintenance and modification outage between January 10, 1988 and January 27, 1988 ultrasonic testing (UT) of the RHR/LPCI [BO] minimum flow lines was conducted to determine if significant interior corrosion (pitting or erosion-corrosion) existed. The UT examination had been planned because significant corrosion was noted at an earlier date in the minimum flow lines of a different system with a similar configuration and operating history.

Based on review of the records and interviews of the personnel, including supervision, involved in the UT examination preparation, performance, and post-examination restoration work, it was determined that the pipe supports were properly installed when the cleaning of the exterior surface of the lines in preparation for the UT examination was completed between January 4, 1988 and January 8, 1988. This was just prior to the planned plant shutdown on January 10, 1988.

The records and interviews indicate that following completion of the UT examination the thermal insulation for the minimum flow lines was installed and inspected prior to returning the plant to service on January 27, 1988. None of the records note removal or reinstallation of the pipe supports. None of the personnel interviewed recall any

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

installation of the pipe supports following the UT examination. In addition, records do not indicate any maintenance or modification activity between the January 1988 plant outage and discovery of the event on August 16, and 17, 1988. As a result, it is concluded that the pipe supports which were reinstalled on August 16, and 17, 1988 had been removed during the January 10, 1988 to January 27, 1988 outage.

Review of records and interviews with personnel did reveal that supervisory personnel did not adequately describe the scope of the work or provide adequate instructions to personnel preparing for and performing the UT examination nor did the supervisory personnel perform adequate inspection of the work while in progress. In addition, the records associated with the work were not adequately reviewed to detect the failure to document removal of the pipe supports and thus help assure complete restoration of the system following the UT examination.

The inadequate supervisory instructions and inspection is considered a failure to properly implement procedures as required by Technical Specification 6.8.A.

Analysis of Event

For each of the pipe supports not properly installed, the plant architect-engineer performed operability evaluations and analyses with the pipe supports in a non-functional state. In both cases, the maximum calculated stress values were less than allowable stress values. As a result, both minimum flow lines were in actuality fully operable even with the pipe supports not attached to the pipe.

Since both RHR/LPCI pump minimum flow lines can be considered as having been fully operable, the event did not have any effect on the operability of safety-related systems.

Corrective Action

Immediate corrective action:

- 1) As noted above, each of the pipe supports was properly attached to the RHR/LPCI pump minimum flow lines within approximately three hours. These actions restored the systems to fully operable conditions without reliance on stress evaluations and analyses which were performed on the following day.
- 2) A critique (records review and personnel interviews) of the event was conducted to determine the causes and provide identification of corrective action.

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TEXT: If more space is required, use additional NRC Form 366A (11/77)

Long-term corrective action:

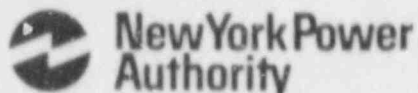
- 1) New York Power Authority personnel involved in the pipe UT examination task (all current Quality Control, Contract Services, and Technical Services supervisory and professional staff personnel) will be required to review the critique of the event and this LER. The review will include a reinforcement of work control requirements of Work Activity Control Procedure 10.1.1 (titled, "Procedure for Control of Maintenance"), a review of the need for supervisory personnel to provide adequate detailed instructions to plant and contracted workers, and a review of the need for supervisory personnel to inspect in-progress work. In addition, the review will reinforce the need for supervisory personnel to review work-related documents during and after completion of the work to provide assurance that the documentation is complete and correct.

Additional information:

Failed Component Identification: None

Similar Previous Events: No other LERs involving failure to properly implement procedures required by Technical Specification 6.8.A have been written at this facility.

James A. FitzPatrick
Nuclear Power Plant
P.O. Box 41
Lycoming, New York 13094
315 342 3840



Radford J. Converse
Resident Manager

September 14, 1988
JAFP-88-0855

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

REFERENCE: DOCKET NO. 50-333
LICENSEE EVENT REPORT: 88-007-00

Dear Sir:

Enclosed please find referenced Licensee Event Report in accordance with 10 CFR 50.73.

If there are any questions concerning this report, please contact Mr. W. Verne Childs at (315) 349-6305.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Radford J. Converse'.

RADFORD J. CONVERSE

RJC:WVC:lar

cc: USNRC, Region I (1)
INPO Records Center, Atlanta, GA (1)
American Nuclear Insurers (1)
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LER/OR File

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