

LICENSEE EVENT REPORT (LER)

|   |                                      |                      |
|---|--------------------------------------|----------------------|
| FACILITY NAME (1)<br>Oyster Creek, Unit 1 | DOCKET NUMBER (2)<br>0 5 0 0 0 2 1 9 | PAGE (3)<br>1 OF 0 3 |
|---|--------------------------------------|----------------------|

TITLE (4)  
Drywell Airlock Not Leak Rate Tested in Accordance with Appendix J

| EVENT DATE (5)   |  |  | LER NUMBER (6)                               |  |                 | REPORT DATE (7) |     |      | OTHER FACILITIES INVOLVED (8) |  |                  |                         |  |  |  |  |  |  |  |  |  |  |                             |                                    |                                    |  |                                   |   |                                      |   |                                   |  |                                      |  |  |   |   |  |           |  |  |  |   |   |  |  |
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| MONTH  | DAY  | YEAR                                       | YEAR   | SEQUENTIAL NUMBER  | REVISION NUMBER | MONTH           | DAY | YEAR | FACILITY NAMES                |  | DOCKET NUMBER(S) |                         |  |  |  |  |  |  |  |  |  |  |                             |                                    |                                    |  |                                   |   |                                      |   |                                   |  |                                      |  |  |   |   |  |           |  |  |  |   |   |  |  |
| 0 9  | 2 7  | 8 8  | 8 8  | 0 2 3  | 0 0             | 1 0             | 3 1 | 8 8  |                               |  | 0 5 0 0 0        |                         |  |  |  |  |  |  |  |  |  |  |                             |                                    |                                    |  |                                   |   |                                      |   |                                   |  |                                      |  |  |   |   |  |           |  |  |  |   |   |  |  |
| <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:15%;">OPERATING MODE (9)<br/>N</td> <td colspan="10">THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more of the following) (11)</td> </tr> <tr> <td rowspan="5">POWER LEVEL (10)<br/>1 1 0 0</td> <td><input type="checkbox"/> 20.402(b)</td> <td><input type="checkbox"/> 20.408(e)</td> <td><input type="checkbox"/> 80.73(a)(2)(iv)</td> <td><input type="checkbox"/> 73.71(b)</td> </tr> <tr> <td><input type="checkbox"/> 20.408(a)(1)(ii)</td> <td><input type="checkbox"/> 80.36(a)(1)</td> <td><input type="checkbox"/> 80.73(a)(2)(v)</td> <td><input type="checkbox"/> 73.71(e)</td> </tr> <tr> <td><input type="checkbox"/> 20.408(a)(1)(iii)</td> <td><input type="checkbox"/> 80.36(a)(2)</td> <td><input type="checkbox"/> 80.73(a)(2)(vi)</td> <td><input checked="" type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 365A)</td> </tr> <tr> <td><input type="checkbox"/> 20.408(a)(1)(iv)</td> <td><input type="checkbox"/> 80.73(a)(2)(i)</td> <td><input type="checkbox"/> 80.73(a)(2)(vii)(A)</td> <td rowspan="2">Voluntary</td> </tr> <tr> <td><input type="checkbox"/> 20.408(a)(1)(v)</td> <td><input type="checkbox"/> 80.73(a)(2)(ii)</td> <td><input type="checkbox"/> 80.73(a)(2)(vii)(B)</td> </tr> <tr> <td><input type="checkbox"/> 20.408(a)(1)(vi)</td> <td><input type="checkbox"/> 80.73(a)(2)(iii)</td> <td><input type="checkbox"/> 80.73(a)(2)(viii)</td> <td></td> </tr> </table> |  |  |  |  |                 |                 |     |      |                               |  |                  | OPERATING MODE (9)<br>N | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more of the following) (11) |  |  |  |  |  |  |  |  |  | POWER LEVEL (10)<br>1 1 0 0 | <input type="checkbox"/> 20.402(b) | <input type="checkbox"/> 20.408(e) | <input type="checkbox"/> 80.73(a)(2)(iv) | <input type="checkbox"/> 73.71(b) | <input type="checkbox"/> 20.408(a)(1)(ii) | <input type="checkbox"/> 80.36(a)(1) | <input type="checkbox"/> 80.73(a)(2)(v) | <input type="checkbox"/> 73.71(e) | <input type="checkbox"/> 20.408(a)(1)(iii) | <input type="checkbox"/> 80.36(a)(2) | <input type="checkbox"/> 80.73(a)(2)(vi) | <input checked="" type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 365A) | <input type="checkbox"/> 20.408(a)(1)(iv) | <input type="checkbox"/> 80.73(a)(2)(i) | <input type="checkbox"/> 80.73(a)(2)(vii)(A) | Voluntary | <input type="checkbox"/> 20.408(a)(1)(v) | <input type="checkbox"/> 80.73(a)(2)(ii) | <input type="checkbox"/> 80.73(a)(2)(vii)(B) | <input type="checkbox"/> 20.408(a)(1)(vi) | <input type="checkbox"/> 80.73(a)(2)(iii) | <input type="checkbox"/> 80.73(a)(2)(viii) |  |
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LICENSEE CONTACT FOR THIS LER (12)

|                          |   |
|--------------------------|---|
| NAME<br>Lynne W. Munzing | TELEPHONE NUMBER<br>AREA CODE: 6 0 9<br>9 7 1 - 4 3 8 9 |
|--------------------------|---|

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

On September 27, 1988, it was discovered that the plant's drywell airlock door is not leak rate tested at the frequency or test pressure required by 10CFR50 Appendix J. The licensee committed to test the drywell airlock every six months, as required by Appendix J, but has been performing the test on a refueling outage interval. Testing prior to reestablishing primary containment has been performed at 10 psig rather than 35 psig. At the time of discovery, the plant was in the RUN mode at approximately full power, but the condition has existed for several operating cycles. The cause of the occurrence is attributed to insufficient administrative controls to ensure that the schedule committed to and test pressure required by Appendix J were implemented. This condition could have safety significance in that a leak larger than allowed by test acceptance criteria could have existed for more than a six-month interval. Immediately upon discovery of the condition, the drywell airlock leak rate test schedule was changed to a six-month interval and proper test pressures were used. A Technical Specification Change Request which complies with 10CFR50 Appendix J testing frequency and pressures has been submitted and is being reviewed by the NRC. Since the time of the testing frequency commitment (1978), a formal action item system for implementation of regulatory commitments has been instituted.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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| FACILITY NAME (1)<br><br>Oyster Creek, Unit 1 | DOCKET NUMBER (2)<br><br>0 5 0 0 0 2 1 1 9 8 8 - 0 2 3 - 0 1 0 | LER NUMBER (6) |                   |                 | PAGE (3) |        |
|   |  | YEAR           | SEQUENTIAL NUMBER | REVISION NUMBER |          |        |
|   |  |                |                   |                 | 0 2      | OF 0 3 |

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

DATE OF DISCOVERY

The condition was discovered on September 27, 1988. It has existed since the approval of the Appendix J leak rate testing program in March 1982.

IDENTIFICATION OF OCCURRENCE

The plant's drywell airlock door is not leak rate tested at the frequency required by 10CFR50 Appendix J. Also, it is not tested at the pressure required in Appendix J after periods in which containment integrity is not required.

CONDITIONS PRIOR TO DISCOVERY

The plant was in the RUN mode at full power at the time of discovery. The condition has existed, however, for several operating cycles.

DESCRIPTION OF OCCURRENCE

10CFR50 Appendix J, section III.D.2(b) requires that airlocks be leak rate tested at six-month intervals. Further, airlocks opened during periods when containment integrity is not required by the plant's technical specifications are required to be tested at the end of such periods at not less than Pa (the calculated peak containment internal pressure related to the design basis accident). For Oyster Creek, Pa is 35 pounds per square inch (psig).

The licensee, in a letter dated November 22, 1978, committed to test the airlock at six month intervals while primary containment is required. However, this commitment was not implemented following approval by the NRC in March 1982. The Technical Specifications, section 4.5.E.2, state that personnel airlock doors will be tested at a pressure of 10 psig each refueling outage. This has been in effect since November 5, 1971, with Amendment 7 to the Technical Specifications. The testing interval has continued to be every refueling outage, as indicated in the Technical Specifications.

The drywell airlock door has normally been tested at 10 psig when preparing to pressurize the Reactor vessel to 1000 psig after a shutdown for the drywell inspection. After the drywell inspection, the airlock has then been retested at 35 psig, which involves placing strongbacks on the inner door to prevent it from being unseated. According to Appendix J, the initial test should be at 35 psig, since primary containment integrity is required for the reactor vessel pressurization.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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|   |  | YEAR           | SEQUENTIAL NUMBER | REVISION NUMBER |          |    |     |
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TEXT (if more space is required, use additional NRC Form 388A's) (17)

APPARENT CAUSE OF OCCURRENCE

The apparent cause of the occurrence is insufficient administrative controls to ensure that the commitments in the November 1978 letter were implemented following NRC approval in March, 1982. The intent with respect to test pressure prior to establishing containment integrity was not clear in the November 1978 letter. Testing has been conducted in accordance with the existing Technical Specification, which predates 10CFR50 Appendix J.

ANALYSIS OF OCCURRENCE AND SAFETY ASSESSMENT

10CFR50 Appendix J provides for periodic verification by test of the leak-tight integrity of the primary reactor containment, and systems and components which penetrate containment. The purpose of the tests is twofold. First, the leak rate tests assure that leakage through the primary reactor containment, and systems and components penetrating primary containment, do not exceed allowable leakage rate values as specified in the technical specifications or associated bases. Second, the leak rate tests assure that periodic surveillance of reactor containment penetrations and isolation valves is performed so that proper maintenance and repairs are made during the service life of the containment.

This event could have safety significance in that a leak larger than allowed by test acceptance criteria could have remained undetected for longer than six months. This condition had the potential to adversely affect the intended function of the drywell airlock door, and to affect offsite doses in the event of an accident.

CORRECTIVE ACTIONS

Upon discovery of the condition, immediate corrective action was taken to change the drywell airlock leak rate test procedure to a six-month interval of performance. Testing at the pressure required by Appendix J has also been implemented. The Technical Specification Change Request currently with the NRC for review will correct the existing anomaly in the Technical Specifications when it is approved and implemented.

The insufficient administrative controls that originally caused this event have since been corrected. There is a formal Licensing Action Item system, whereby individual commitments are identified and tracked by the Licensing Department until they have been appropriately formalized in Oyster Creek plant documents.

(0606A)



GPU Nuclear Corporation  
Post Office Box 388  
Route 9 South  
Forked River, New Jersey 08731-0388  
609 971-4000  
Writer's Direct Dial Number:

October 31, 1988

Director of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, DC 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Licensee Event Report

This letter forwards one (1) copy of Licensee Event Report (LER)  
No. 88-023.

Very truly yours,

E. E. Fitzpatrick  
Vice President & Director  
Oyster Creek

EEF:GB:smz(0705A)  
Enclosures

cc: Mr. William T. Russell, Administrator  
Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Mr. Alexander W. Dromerick  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

NRC Resident Inspector  
Oyster Creek Nuclear Generating Station  
Forked River, NJ 08731

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