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At 1315 hours on May 28, 1988, Waterford Steam Electric Station Unit 3 was shutdown in hot standby when Operations personnel discovered isolation valve FP 6031A for Sprinkler FPM-1 closed. FPM-1 protects Reactor Coolant Pumps 1A and 1B and f required to be operable whenever Reactor Coolant System (RCS) Loop 1 is required to be operable. FP 6031A was shut on May 21, 1988, in preparation for the Integrated Leak Rate Test and mistakenly left shut on May 24, 1988, when the system was restored. RCS loop 1 was required to be operable at 0656 hours on May 26. Thus, the plant operated in a condition prohibited by Technical Specification (TS) 3.7.10.2 from May 26, 1988, to May 28, 1988, when the valve was reopened.

The original valve lineup sheet used to restore systems inside containment was contaminated and disposed of when the operators exited containment. This valve was overlooked and not signed off on the original sheet. When the replacement sheet was signed off, operators mistakenly thought this valve had been verified in the proper position. Thus, the root cause of this event is cognitive personnel error. Procedures are being revised to require contaminated (bagged) valve lineup sheets be photocopied or verified upon exit from the Radiation Controlled Area. Since RCPs are not safety-related and their respective fire detectors are not required by TS, there was no safety significance to this 1/1 IE22 event.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104 EXPIRES: 8/31/88

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6) PAGE	PAGE (3)								
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Electric Station Unit 3	0 5 0 0 0 3 8 2	2 8 8 - 0 11 13 - 0 10 0 12 OF	0 4								

TEXT (If more space is required, use additional NRC Form 366A's) (1")

On May 24, 1988, two non-licensed Operations personnel entered the Reactor Containment Building (RCB) (EIIS Identifier NH) to restore valves which had been repositioned on May 21, 1988, for the Integrated Leak Rate Test (ILRT) of the RCB. Valves are listed by Containment Penetration (EIIS Identifier NH-PEN) number on the ILRT Valve Lineup Table. Operations performed several valve lineups associated with various penetrations including the Fire Protection System (FPS) (EIIS Identifier KP) valves associated with Penetration 60. However, FP 6031A (EIIS Identifier KP-ISV), the manually operated isolation valve for Sprinkler Number FPM-1 (EIIS Identifier KP-SRNK), was inadvertently missed. FP 6031A was not signed off as being repositioned and verified open on this lineup sheet.

The lineup sheet for Penetration 60 contains several lineouts and handwritten changes. FPS valves located in the RCB and Reactor Auxiliary Building (RAB) (EIIS Identifier NF) are separated by a dotted line. A cursory examination of the lineup sheet would indicate that one of these lineouts appears to separate the valves by location. This would have caused the Operators to think FP 6031A and FP 603A were located in the RAB vice RCB. FP 6031A is required to be repositioned from closed to open, but FP 603A and all of the other valves inside containment on this page remain closed per the valve lineup sheet. These changes were required because the test was originally intended to isolate and drain all FPS lines inside containment, which required temporary relief from T.S. 3.7.10.4. Guidance received from the NRC staff shortly before the test indicated that it would be preferable to leave the hose stations operable, only isolating the sprinkler systems to prevent inadvertent actuations. These changes were made to comply with this guidance, and were not considered unusual or difficult to read, however in the stressful containment environment they evidently contributed to missing this valve. The symmetric isolation valve for FPM-2 was not near such a lineout and was realigned correctly.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

When the Operators exited the RCB, the valve lineup sheet they had brought into containment had become contaminated and was disposed as radioactive waste. The Operators signed off a replacement sheet for the contaminated valve lineup sheet. They felt certain that all valves inside containment had been positioned as required and therefore did not compare the old and new copies line by line. Since they had completed 20 to 30 valve lineups in containment, the missed valves would not have been noticed when the replacement sheets were signed. Thus, the root cause of this event is classified as cognitive personnel error.

At 1315 hours on May 28, 1988, Waterford Steam Electric Station Unit 3 was shutdown in hot standby when Operations personnel noticed ILRT tags on FP 6031A and FP 603A and subsequently discovered FP 6031A was closed during a containment tour. ILRT tags were not found on other FP valves in containment. After checking with the Control Room, FP 6031A was opened. FP 6031B (Penetration 61) was later verified open.

Sprinkler FPM-1, which protects Reactor Coolant Pumps (RCPs) (EIIS Identifier AB-P) 1A and 1B, is required to be crarable per Technical Specification (TS) 3.7.10.2 whenever Reactor Coolant Symm (RCS) (EIIS Identifier AB) Loop 1 is required to be operable. TS 3.4.1.3 and 3.4.1.4 specify that two Shutdown Cooling Trains and/or Reactor Coolant Loops should be operable in modes four and five respectively. TS 3.4.1.2 requires both Reactor Coolant Loops be operable in mode three. At 0656 hours on May 26, 1988, both Shutdown Cooling Trains were aligned in preparation for entering mode three. Mode three was entered at 1401 hours on May 26, 1988. Thus, the plant operated in a condition prohibited by Technical Specifications from 0656 hours on May 26, 1988, to 1315 hours on May 28, 1988.

NRC Form 366A

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104 EXPIRES: 8/31/88

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

Procedure PE-5-001, "Containment Integrated Leak Rate Test," will be revised prior to the next ILRT. This will remove the lineouts and make the ILRT Valve Lineup Tables easier to read. Procedure UNT-4-009, "Control, Distribution, Handling, and Use of POM Procedures," is being revised to require contaminated (bagged) valve lineup sheets be photocopied upon exit from the Radiation Controlled Area, or that hand copies be verified line by line. RCPs are not safety-related equipment and the three respective Fire Detectors (EIIS Identifier IC-28) associated with FPM-1 and FPM-2 are not required by TS. A submittal to remove these sprinklers from the TS is under consideration. The RCP Fire Detectors were operable and would have detected a fire, and Fire Hydrant Hose Stations (EIIS Identifier KP-HYD) were available in containment for use in firefighting. The plant was being heated up after a refueling outage, decay heat levels were very low, and natural circulation through either loop would have been sufficient to remove decay heat. Additionally, RCS Loop 2 was always operable during the event. Thus, there was no safety significance to this event.

SIMILAR EVENTS

None

PLANT CONTACT

R.S. Starkey, Operations Superintendent, 504/464-3178.



LOUISIANA POWER & LIGHT

POWER & LIGHT WATERFORD 3 SES . PO. BOX B . KILLONA, LA 70066-0751

June 24, 1988

W3A88-0069 A4.05 QA

U.S. Nuclear Regulatory Commission A'TTENTION: Document Control Desk Washington, D.C. 20555

SUBJECT: Waterford 3 SES

Docket No. 50-382 License No. NPF-38

Reporting of Licensee Event Report

Attached is Licensee Event Report Number LER-88-013-00 for Waterford Steam Electric Station Unit 3. This Licensee Event Report is submitted pursuant to 10CFR50.73(a)(2)(i).

Very truly yours,

N.S. Carns

Plant Manager - Nuclear

NSC/WEM:rk

Attachment

cc: R.D. Martin, NRC Resident Inspectors Office, INPO Records Center (J.T. Wheelock), E.L. Blake, W.M. Stevenson, D.L. Wigginton

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