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NewYork Power Authority

Michael J. Colomb
Site Executive Officer

December 4, 1998
JAFP-98-0386

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Subject: **Docket No. 50-333**
LICENSEE EVENT REPORT: LER-98-012

Failure to Meet Primary Containment Leakage Rate Testing Program Requirements

Dear Sir:

This report is submitted in accordance with 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications."

There are no commitments contained in this report.

Questions concerning this report may be addressed to Mr. Gordon Brownell at (315) 349-6360.

Very truly yours,

MICHAEL J. COLOMB

MJC:GB:las
Enclosure

cc: USNRC, Region 1
USNRC, Project Directorate
USNRC Resident Inspector
INPO Records Center

NRC FORM 366 (6-1998) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

APPROVED BY OMB NO. 3150-0104 EXPIRES 06/30/2001

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TITLE (4)

Failure to Meet Primary Containment Leakage Rate Testing Program Requirements

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 NAME	DOCKET NUMBER
									N/A	05000
11	04	98	98	012	00	12	04	98	FACILITY NAME	DOCKET NUMBER
									N/A	05000

OPERATING MODE (9)	N
POWER LEVEL (10)	0

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

	20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)
	20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)
	20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71
	20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER
	20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A
	20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Mr. Gordon Brownell, Licensing Engineer	(315) 349-6360

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On November 04, 1998, during a review of test procedures associated with the plant's Primary Containment Leakage Rate Testing Program, it was identified that Type C local leak rate test (LLRT) procedures associated with the Reactor Water Recirculation (RWR) System's inboard mini purge line containment isolation valves contained an error. This error resulted in inaccurate leakage rate test results and failure to meet the requirements of the Testing Program. This failure is a violation of surveillance requirements of Technical Specifications (TS) Section 4.7.A.2. At the time of the discovery, the mode switch was in the REFUEL position while the plant was conducting Refuel Outage 013.

The probable cause for the deficient test procedures was less than adequate technical reviews during procedure revisions.

Corrective actions include revising the test procedures, satisfactory completion of leakage rate testing on the subject RWR System isolation valves, counseling personnel involved with the inadequate procedure technical reviews, and conducting an independent review of all LLRT procedures.

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TEXT *(If more space is required, use additional copies of NRC Form 366A)* (17)

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EVENT DESCRIPTION

On November 04,1998, during a review of test procedures associated with the plant's Primary Containment Leakage Rate Testing Program, it was identified that Type C local leak rate test procedures ST-39B-X31Ac, "Type C Leak Test of RWR A Mini Purge line valves (IST)" and ST-39B-X31Bc, "Type C Leak Test of RWR B Mini Purge Line Valves (IST)" contained an error associated with the testing of Reactor Water Recirculation (RWR) System's [AD] inboard mini purge line containment isolation valves 02-2RWR-13A and B. The test frequency for the two valves is established by the Testing Program at 24 month intervals. The last and only test performance for the two valves, using the incorrect procedures, was during the plant's fall 1996 Refuel Outage. The procedure error resulted in incorrect leak rate tests results and failure to meet the requirements of the Primary Containment Leakage Rate Testing Program. This failure is a violation of Technical Specifications (TS) Section 4.7.A.2 surveillance requirements. At the time of the discovery, the mode switch was in the REFUEL position while the plant was conducting Refuel Outage 013.

The "A" and "B" loops of the RWR System minipurge line containment isolation piping configuration consist of an inboard (02-2RWR-13A/B) and outboard (02-2RWR-41A/B) 3/4 inch stainless steel check valve. The identified test procedure errors consisted of establishing test gas vents at incorrect locations. Specifically, test pressures were applied to the vessel side of the inboard check valves. The test configuration then required gas leakage to penetrate through both the inboard and outboard check valves with test vents established outboard of 02-2RWR-41A/B. This resulted in inaccurate and lower than actual recorded leakage flow rates for the inboard check valves. The correct position for the vent path for testing of inboard valves 02-2RWR-13A/B is located in the piping between the inboard and outboard containment isolation check valves.

EVENT CAUSE

The probable cause for this event was less than adequate technical reviews during surveillance test procedure revisions.

Procedures ST-39B-X31Ac and ST-39B-X31Bc were revised in 1996 following the completion of a plant modification which replaced existing power operated outboard RWR System mini purge isolation valves with the currently installed 3/4 inch piston check valves. The modification affected the inboard isolation valves Type C leakage rate test flow path configuration; however, procedure reviews did not identify the required changes.

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ANALYSIS

This report is being submitted in accordance with 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications." TS Section 4.7.A.2.a, Surveillance requirements for Containment Systems, requires, in part, leakage rate testing of the Primary Containment in accordance with the Primary Containment Leakage Rate Testing Program.

The function of all Primary Containment isolation valves is to provide necessary isolation of the containment in the event of accidents or similar conditions when the release of containment atmosphere cannot be permitted.

This event had minimal safety significance. An operability review was conducted and determined the penetrations were operable based on acceptable testing in 1996 of the penetration's outboard isolation valves. Additionally, both inboard and outboard isolation check valves were successfully Type C leak rate tested on November 04, 1998, proving their isolation capability.

EXTENT OF CONDITION

This event was determined to be an isolated incident based on pre-test reviews of Local Leakage Rate Test procedures during each of the Refuel Outage 013 LLRT's. The reviews were responsible for the identification of the reported procedure error. No other similar errors were identified.

An additional independent review of all LLRT procedures is being conducted by the Operations Department and is scheduled to be completed prior to plant startup from Refuel Outage 013. This review will provide further assurance that Primary Containment Leakage Rate Testing Program requirements have been satisfied.

CORRECTIVE ACTIONS

1. Type C leak rate test procedures ST-39B-X31Ac and ST-39B-X31Bc were revised to provide an effective vent path for testing valves 02-2RWR-13A and 02-2RWR-13B.

2. As-found leakage rate testing was completed on the subject valves per the revised procedures. Both valves met acceptance criteria.

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CORRECTIVE ACTIONS (cont.)

3. Plant personnel involved in the 1996 development and review of two surveillance test procedure revisions were counseled by the Operations Manager on the importance of maintaining a questioning attitude and conducting rigorous evaluations of all aspects of procedure changes.

4. Operations Department is completing an independent review of all LLRT procedures to assure that similar errors do not exist.
(Scheduled Completion Date - Prior to Plant Startup from Refuel Outage 013)

ADDITIONAL INFORMATION

A. Previous Similar Events:

LERs 95-002, 95-003, and 95-004 describe previous similar events in which procedure deficiencies resulted in all or part of a surveillance requirement being missed or not performed in compliance with TSs.

B. Failed Components: None