NRC FORM 366 (6-1996) LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)											APPROVED ONB NO. 3150-0104 EXPIRES: 06/30/2001 Estimated burden per response to comply with this mandatory information request 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555- 0001, and to the Paperwork Reduction Project (3150-0104). Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to the information collection.												ated ents (T-6 555- e of ation the d to			
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ABSTRACT (Lincit to 1400 spaces, i.e., approximately 15 single-space typewritten lines) (16)

On October 15, 1998, instrument and controls (I&C) personnel were troubleshooting a position indication problem for a Unit 2 accumulator tank common vent header valve. The troubleshooting found that the indication lights are controlled by demand only, and not by valve position. Follow-up discussions with operators found that on some occasions, ASME quarterly inservice stroke time tests for this valve, and the identical valve in Unit 1, were timed using the indication lights. A review of past stroke time testing and a comparison of indication lights with the valve position indicator was performed. On December 29, 1998, it was determined that the use of the indication lights was not adequate to meet the stroke time testing requirements and that previous tests employing this method represented inadequately performed surveillances. Therefore, the unit operated in a condition prohibited by the Technical Specifications (TS) when these surveillances were relied upon to meet TS requirements.

The cause of these events was inadequate test procedures. The test procedures were revised to advise operators that valve testing will utilize the position indicators.

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A. REQUIREMENT FOR REPORT

This report is required per 10 CFR 50.73 (a)(2)(i) because the plant operated in a condition prohibited by the Technical Specifications (TS) when surveillances were inadequately performed.

B. UNIT STATUS AT TIME OF EVENT

At the time of the discovery of this event, both Unit 1 and Unit 2 were operating in Mode 1 (power operation) at 100 percent of rated thermal power. Other than that described herein, there was no inoperable equipment that contributed to the occurrence of this event.

C. DESCRIPTION OF EVENT

On October 15, 1998, instrument and controls (I&C) personnel were troubleshooting a position indication problem for the Unit 2 accumulator tank common vent header valve, 2HV-0943A. During the troubleshooting, it was determined that the indication lights are controlled by demand only, and not by valve position. Follow-up discussions with operators found that on some occasions, ASME quarterly inservice stroke time tests for this valve, and the identical valve in Unit 1, were timed using the indication lights. A review of past stroke time testing and a comparison of indication lights with the valve position indicators was performed. The review found that the stroke times are roughly equivalent. However, demand indication could not detect a valve's failure to stroke. On December 29, 1998, it was determined that the use of the indication lights was not adequate to meet the stroke time testing requirements and that previous tests employing this method represented inadequately performed surveillances. Therefore, the unit operated in a condition prohibited by TS 5.5.8 when these surveillances were relied upon to meet TS requirements.

D. CAUSE OF EVENT

The cause of these events was inadequate test procedures. Procedures 14825-1/2, "Quarterly Inservice Valve Test", did not specifically state the means used to verify these valves' stroke times.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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E. ANALYSIS OF EVENT

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If an accumulator valve had failed to operate, it would not have prevented fulfillment of the system's safety function. Furthermore, there is no evidence to suggest that any of these valves would have failed to operate when called upon. Based on these considerations, there was no adverse affect on plant safety or on the health and safety of the public as a result of this event.

F. CORRECTIVE ACTIONS

- 1) Procedures 14825-1/2 were revised to instruct operators to utilize the position indicators when testing these valves.
- 2) A broadness review of TS surveillances determined that this same type of valve is utilized in a similar accumulator tank common vent header application in each unit, but its demand position incorporates circuitry that reflects actual valve position. Similar valves are used for charging pump throttling and for reactor head venting. An evaluation of the applicable test procedures for these valves determined that they already contain appropriate instructions for using position indicators.

G. ADDITIONAL INFORMATION

- Failed Components: None
- 2) Previous Similar Events: None
- Energy Industry Identification System Code: Accumulator / Safety Injection System - BQ Charging Pump / Chemical Volume and Control System - CB Reactor Vent / Reactor Coolant System - AB