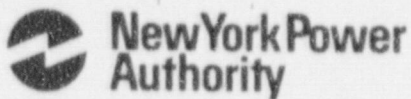


James A. FitzPatrick
Nuclear Power Plant
268 Lake Road
P.O. Box 41
Lycoming, New York 13093
315-342-3840



Michael J. Colomb
Site Executive Officer

February 10, 1998
JAFF-98-0055

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-97-012-01

Drywell Personnel Airlock Outer Door Seals Local Leak Rate Test Not Properly Performed

Dear Sir:

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

The purpose of this supplement is to reflect the results of the root cause evaluation of this event completed on January 31, 1998.

Questions concerning this report may be addressed to Mr. Richard A. Plasse, Jr. at (315) 349-6793.

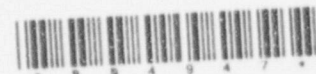
Very truly yours,

MICHAEL J. COLOMB

MJC:RAP:las
Enclosure

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

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PDR ADOCK 05000333
S PDR



IE221,

NRC FORM 366 (4-95)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 04/30/98 <small>ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F-3), 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.</small>
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)		

FACILITY NAME (1) James A. FitzPatrick Nuclear Power Plant	DOCKET NUMBER (2) 05000333	PAGE (3) 01 OF 06
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TITLE (4)
Drywell Personnel Airlock Outer Door Seals Local Leak Rate Test Not Properly Performed

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
12	14	97	97	-- 012	-- 01	02	10	98	N/A	05000
									N/A	05000

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)								
		20.2201(b)		20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	50.73(a)(2)(i)		50.73(a)(2)(viii)		
POWER LEVEL (10)	25	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 Mr. Richard A. Plasse, Jr., Sr. Licensing Engineer	TELEPHONE NUMBER (include Area Code) (315) 349-6793
--	--

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
(If yes, complete EXPECTED SUBMISSION DATE.)						

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

On 12/14/97, while performing a restoration valve lineup of an Operations Surveillance Test Procedure, ST-39A, "Type B Leak Test of Airlocks", a licensed operator discovered that a local leak rate test valve (16LLRT-930) was incorrectly labeled. Further review determined the incorrectly labeled valve had resulted in an improperly performed 10CFR50, Appendix J, Type B local leak rate test (LLRT) on the outer personnel access door (i.e. the outer door seals were not tested). Technical Specification (TS) 6.20 requires primary containment leakage rate testing to be accomplished in accordance with the Primary Containment Leakage Rate Testing Program. Section 6.4.2 of the program requires that the airlock door seals be tested prior to re-establishing containment integrity and within seven days after the airlocks are opened when containment integrity is required. Based on a historical review, it has been determined that the mislabeled valve has resulted in invalid performance of the TS 6.20 required Type B LLRT on the personnel airlock outer door seals since 11/24/96. At the time of discovery, the plant was performing a reactor startup with power at approximately 25 percent with the reactor mode switch in RUN.

The mislabeling occurred in the course of valve replacement maintenance during a refueling outage on 11/15/96. The probable cause of the error was inattention to detail on the part of the mechanic who installed the label (it is not possible to identify which of two mechanics involved erred) and on the part of the independent label verifier who subsequently reviewed the installation.

Corrective actions include: removal of the incorrect label, installation and verification of a correct label on 16LLRT-930, performance of the type B LLRT on the outer personnel access door seals, and conducting briefings on the details and lessons learned from this event.

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		97 --	012 --	01	

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

EIIS Codes are in [].

EVENT DESCRIPTION

On December 14, 1997, while performing a restoration valve lineup of an Operations Surveillance Test Procedure, ST-39A, "Type B Leak Test of Airlocks", a licensed operator discovered that a local leak rate test valve (16LLRT-930) was incorrectly labeled. Further review determined the incorrectly labeled valve had resulted in an improperly performed 10CFR50, Appendix J, Type B local leak rate test (LLRT) on the outer personnel access door (i.e. the outer door seals were not tested). Technical Specification (TS) 6.20 requires primary containment leakage rate testing to be accomplished in accordance with the Primary Containment Leakage Rate Testing Program. Section 6.4.2 of the program requires that the airlock door seals [BD] [AL] be tested prior to re-establishing containment integrity and within seven days after the airlocks are opened when containment integrity is required. Based on a historical review, it has been determined that the mislabeled valve resulted in invalid performance of the TS 6.20 required Type B LLRT on the personnel airlock outer door seals since November 24, 1996. At the time of discovery, the plant was performing a reactor startup with power at approximately 25 percent with the mode switch in RUN.

The mislabeling occurred while performing a valve replacement during a refueling outage on November 15, 1996. The exact sequence and cause of the mislabeling error could not be positively confirmed as the mechanical maintenance installer has no specific recollection of the valve replacement activity.

The sequence of events leading up to and immediately following the discovery of the improperly performed surveillance test is presented below:

- 1994 (approx.) LLRT valves in the drywell entrance are given temporary labels by plant operators. Photographs show that these temporary labels were placed on the correct valves.
- 11/15/96 2 of the 3 LLRT valves in the drywell entrance are replaced by mechanical maintenance under WRs 95-3853-00 and 95-3854-00. As part of the valve replacement work the temporary labels were replaced with permanent labels. A permanent plant label for valve 16LLRT-930 (airlock outer door seals test connection valve) is incorrectly installed on the airlock emergency makeup air connection valve at the completion of this maintenance. The other 2 LLRT valves were properly labeled. In addition, the mechanical maintenance installer incorrectly replaced the air lock emergency makeup air connection valve (an identical valve) instead of one of the LLRT valves (16LLRT-930) as planned. Due to the fact that the valves were identical, the improper valve replacement did not result in any further plant impact.
- 11/17/96 The configuration label coordinator incorrectly performed an independent verification of the installation of the 3 permanent plant labels utilizing drawing DSK-16G ("LLRT Connections"). Contributing to this error was the absence of the airlock emergency makeup air connection valve (which was not an LLRT connection) on drawing DSK-16G. (see figure 1)

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EVENT DESCRIPTION (cont'd.)

- 11/24/96 The airlock volume and door seals are tested prior to establishing primary containment integrity. The outer door seals test is actually invalid due to the labelling error of 11/15/96 on 16LLRT-930. The airlock volume test and inner door seals test are completed satisfactorily.
- 12/1/96 The airlock volume and door seals are tested prior to establishing primary containment integrity. The outer door seals test is actually invalid due to the labelling error of 11/15/96 on 16LLRT-930. The airlock volume test and inner door seals test is completed satisfactorily.
- 12/11/96 Airlock door seals (inner and outer) are tested following airlock doors being opened when primary containment is required. The outer door seals test is actually invalid due to the labelling error of 11/15/96. The inner door seals test is satisfactory.
- 1/27/97 Airlock door seals (inner and outer) are tested prior to establishing primary containment integrity following a plant outage. The outer door seals test is actually invalid due to the labelling error of 11/15/96. The inner door seals test is satisfactory.
- 1/29/97 Airlock door seals (inner and outer) are tested following airlock doors being opened when primary containment is required. The outer door seals test is actually invalid due to the labelling error of 11/15/96. The inner door seals test is satisfactory.
- 5/29/97 Airlock door seals (inner and outer) are tested prior to establishing primary containment integrity following a plant outage. The outer door seals test is actually invalid due to the labelling error of 11/15/96. The inner door seals test is satisfactory.
- 12/7/97 A routine ASME Section XI visual examination is performed satisfactorily on outer door seals while the door is opened for a forced outage.
- 12/10/97 The inner seal on the outer door is subsequently replaced after being damaged during the forced outage. A subsequent ASME Section XI visual inspection of the replaced seal is satisfactorily performed. Airlock door seals are tested satisfactorily prior to establishing primary containment integrity following the outage. The outer door seals test is actually invalid due to the labelling error of 11/15/96.

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EVENT DESCRIPTION (cont'd.)

12/14/97 Airlock door seals are tested satisfactorily following airlock doors being opened when primary containment is required. The outer door seals test is actually invalid due to the labelling error of 11/15/96. Plant operator questions valve 16LLRT-930 (airlock outer door seals test connection valve) labeling while verifying the test restoration lineup. Further research concludes that the airlock emergency makeup air valve is mislabeled as valve 16LLRT-930. Valve 16LLRT-930 is not labeled at this time. DER 97-1753 is initiated. Valve 16LLRT-930 label is immediately corrected with a temporary label.

12/15/97 Airlock outer door seals are tested satisfactorily using the correct test connection.

CAUSE OF THE EVENT

The cause for this failure to properly perform the TS required surveillance test was a loss of configuration control of the correct test valve, 16LLRT-930. Based on review of plant records and photographs of field walkdowns, it appears the mislabeling of 16LLRT-930 occurred during planned maintenance on November 15, 1996. The maintenance mechanic, however, has no specific recollection of the maintenance activity or the labeling he performed of the LLRT test valves for the personnel airlock. The reason for the mislabeling event is not known, but it is assumed to be a human performance error. The independent verification of the valve labeling performed by the configuration label coordinator was inadequate in that he failed to identify that the correct component had not been properly labeled. The root cause evaluation confirmed the maintenance mechanic and label coordinator failed to identify and verify the correct test valve, resulting in improper labeling and maintenance on the wrong valve which resulted in a loss of configuration control.

ANALYSIS

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)B, which requires licensees to report "any operation or condition prohibited by the plant's Technical Specifications." The TS required type B LLRT surveillance test for the outer personnel access door was improperly performed (i.e. the outer door seals were not tested) due to a mislabeling event on its associated test valve.

This event was not safety significant. A review of surveillance tests on the airlock seals indicated proper testing of the inner door seals with no significant increase in leakage through the inner door seals during the period of outer door seals missed surveillances. A review of surveillance tests conducted on the airlock volume during the period, which tests the outer door seals also, indicated proper sealing with no significant leakage from the airlock volume. The tests on the inner door seals and on the airlock volume were performed within TS acceptance criteria. The inner seal on the outer door was satisfactorily inspected using ASME Section XI visual inspection criteria on 12/7/97. The seal was replaced due to damage during the forced outage. A subsequent ASME Section XI visual inspection of the replaced seal performed on 12/10/97 was completed satisfactorily.

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CORRECTIVE ACTIONS

1. The maintenance mechanic and the configuration label coordinator responsible for the mislabeling error have been counseled. (Completed January 13, 1998)
2. Operations personnel removed the incorrect label and installed and verified a temporary label on the correct 16LLRT-930 valve. (Completed December 15, 1997)
3. Operations personnel verified correct labeling for the LLRT connection on the other airlock (i.e. emergency access hatch). (Completed January 13, 1998)
4. The missed surveillance test on the personnel airlock outer door seals contained in ST-39A was properly performed. (Completed December 15, 1997)
5. Plant personnel will be briefed on the details of the event and the lessons learned. (Completed January 15, 1998)
6. Plant drawing DSK-16g will be updated to reflect the presence of the emergency makeup air connection valve and provide additional clarification to the LLRT connections. (Completed January 23, 1998)
7. The Authority completed a comprehensive root cause evaluation of this event on January 31, 1998. The following additional corrective actions were identified to prevent recurrence of a similar event:
 - a. Reinforce the management expectation to mechanical maintenance personnel that each maintenance worker is responsible to ensure they are working on the correct component. (Scheduled Completion Date February 20, 1998)
 - b. Review all labeling errors during the last two years, and a sampling of labels installed and verified by the individuals involved in this event. (Scheduled Completion Date March 15, 1998)

ADDITIONAL INFORMATION

- A. Failed Component - None
- B. Previous Similar Events: LERs 97-006, 95-014, 95-012, 94-003, 93-016, 93-011 described events in which TS required surveillance tests were missed. However, the causes for those previous occurrences were not similar; therefore, the corrective actions taken would not have precluded this event.

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FIGURE 1

