NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Perry Nuclear Power Plant, Unit 1	0 5 0 0 0 4 4 0	1 OF 0 3

TITLE (4)

Failure To Correct Limitorque Nonconformance Results In Technical Specification Violation

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 NAMES	DOCKET NUMBER(S)
0 8	3 1	8 6	8 6	0 5 7	0 0	1 0	0 1	8 6		0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
2	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
0 0 0	20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
	20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
	20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
	AREA CODE
Paul Russ, Compliance Engineer, ext. 6472	2 1 6 2 5 9 - 3 7 3 7

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

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

On September 3, 1986, at 1300 it was discovered that containment isolation valves 1E12-F073A and 1P11-F090 had not been deactivated in the closed position as required by Technical Specification 3.6.4 prior to entering Operational Condition 2 (Startup). The plant entered Operational Condition 2 on August 31. These valves utilize Limitorque operators whose environmental qualifications could not be verified.

The cause of the event was an inadequacy in the Nonconformance Report (NR) program which did not require routing of the NR's identifying the potential environmental qualification deficiencies to the Control Room.

The deficient valve operators have been reworked to provide one-for-one replacement of suspect wiring with qualified wiring. The NR program has been revised to ensure all NRs which apply to systems, structures or components which support plant operation be immediately reviewed by the Control Room Shift Supervisor. Additionally, the program now allows the Shift Supervisor to specify rapid disposition of NRs which potentially impact system operability. These dispositioned NRs are then reviewed by the Control Room Shift Supervisor.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Perry Nuclear Power Plant, Unit 1	0 5 0 0 0 4 4 0	8 6	— 0 5 7	— 0 0	0 2 OF 0 3

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

On September 3, 1986, at 1300 it was discovered that containment isolation valves [ISV] 1E12-F073A and 1P11-F090 had not been deactivated in the closed position as required by Technical Specification 3.6.4 prior to entering Operational Condition 2 (Startup) on August 31. At the time of the event the plant had just entered Operational Condition 2, reactor vessel [RPV] pressure was approximately atmospheric and reactor coolant temperature approximately 110 degrees.

Inspection and Enforcement Notice IEN 86-03, dated January 14, 1986, raised concerns with the environmental qualification of wiring in Limitorque motor operated valve (MOV) operators. Subsequent investigation, to verify environmental qualification on Limitorque operators evaluated to be susceptible to a harsh environment, revealed twenty four operators with wiring whose qualification was indeterminate. Nonconformance Reports (NRs) were generated for these operators. Seventeen of these operators were reworked to provide one-for-one replacement of suspect wiring with qualified wiring. The seven remaining MOV's were to be deenergized in their post accident position prior to entering Operational Condition 2, and reworked prior to exceeding 5% power. On August 31, at 2339 the plant entered Operational Condition 2 but the seven MOV operators with suspect wiring had not been deenergized in their safety position. Two of these MOV's are containment isolation valves 1E12-F073A and 1P11-F090. Since the wiring in these MOVs was not environmentally qualified the valves were considered inoperable and should have been deenergized in the closed position in accordance with Technical Specification 3.6.4. The plant returned to Operational Condition 4 (Cold Shutdown) on September 2. This problem was identified while in Operational Condition 4 on September 3. These operators were deenergized prior to reentering Operational Condition 2.

The cause of this event was an inadequacy in the Nonconformance Report (NR) program which did not require routing of the NR's identifying the MOVs lacking environmental qualification to the Control Room. The Limitorque MOV operators were considered inoperable due to the lack of qualification of installed wiring.

Valve 1E12-F073A "RHR Heat Exchanger Shell Side Vent Valve" is a 1 inch line which vents the shell side of RHR A and C heat exchangers to the suppression pool. This valve receives no automatic isolation signals but can be operated manually from the Control Room and is backed-up by valve 1E12-F074A. Additionally, a check valve in the line prevents flow of suppression pool water out of containment. Therefore, failure of 1E12-F073A would have no safety significance.

Valve 1P11-F090 "Containment Pool Drain To Condensate System Valve" is normally closed and backed-up by valve 1P11-F080 which is also normally closed. Additionally, there are two other normally closed valves in this line

which prevent drainage of the upper pool to the condensate transfer and storage system. Therefore, failure of 1P11-F090 would have no safety significance.

The five remaining Limitorque MOV's are not containment isolation valves and are located outside of containment. Failure of these valves would have no safety significance. No previous similar events were identified.

The following corrective actions have been taken to prevent recurrence:

1) The seven Limitorque MOV operators have been reworked to provide one-for-one replacement of suspect wiring with qualified wiring.

2) The NR program has been revised to ensure all NRs which apply to systems, structures or components which support plant operation be immediately reviewed by the Control Room Shift Supervisor. Additionally, the program now allows the Shift Supervisor to specify rapid disposition of NRs which potentially impact system operability. These dispositioned NRs are then reviewed by the Control Room Shift Supervisor.

3) A review was performed of all outstanding NRs for impact on system operability. No similar problems were identified.

Energy Industry Identification System Codes are identified in the text as [XX].