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June 12, 1992

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SUBJECT: Arkansas Nuclear One - Unit 1
Docket No. 50-313
License No. dPR-51
Licensee Event Report 50-313/92-004-00

Gent emen:

In accordance with 10CFR50.73(a)(2)(i)(B), attached is the subject report concerning the failure to perform a post maintenance test.

Very truly yours,

James J. Fisicaro Director, Licensing

> JJF/RHS/mmg Enclosure

CCI

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# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Arkansas Nuclear One, Unit One

DXXET NUMBER (2) PAGE (3) 0 5 0 0 0 3 1 3 1 3 1 0 0 0 4

TITLE (4) Failure To Perform A Post Maintenance Local Leak Rate Test Prior To Plant Heatup Due To Inadequate Procedural Guidance Results In Operation Prohibited By Technical Specifications

EVENT DATE (	5)	LER NUMBER	(6)	REPORT	DATE (7)	OTHER I	ACILITI	ES INVULVED (8)
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On May 15, 1992, with the plant at 100 percent power, it was identified that a Technical Specifications required post maintenance test (PMT) for a containment isolation valve had not been performed prior to plant heatup and startup from refueling outage 1R10. On April 17, 1992, with the unit in cold shutdown, SS-146, which is a 3/4 inch manually operated globe valve which serves as the outboard Reactor Building isolation valve for the steam generator sampling system was rebuilt in accordance with a corrective action job order. The valve was then provisionally turned over to Operations pending completion of the job order PMT requirements which included a Local Leak Rate Test (LLRT) and a visual inspection at operating temperature and pressure. However, the PMT hold form failed to reference. the required LLRT. Subsequently, the Operations reviewer failed to identify the PMT requirement as a heatup restraint. On May 4, 1992, plant heatup and startup commenced without the LLRT having been performed. The evaluation of this event concluded that the existing process does not ensure adequate control of the provisional release of equipment from Maintenance to Operations. The PMT process will be evaluated and corrective actions to address the root cause will be completed by September 4, 1992.

#### LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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# A. Plant Status

At the time this condition was identified, Arkansas Nuclear One, Unit One (ANO-1) was operating at approximately 100 percent of rated power. Reactor Coolant System (kuS) [AB] pressure was 2155 psig and temperature was 579 degrees.

# B. Event Description

On May 15, 1992, at approximately 1630, it was identified that a Technical Specifications required post maintenance test (PMT) for a containment isolation valve was not performed prior to plant heatup and startup from refueling outage 1R10.

Technical Specification 3.6.1 requires that Reactor Building integrity shall be maintained whenever RCS pressure is 300 psig or greater, RCS temperature is 200 degrees or greater and nuclear fuel is in the core. In addition, Technical Specification 4.4.1.3 requires that any major modification or seplacement of components affecting Reactor Building integrity shall be followed by either an integrated leak rate test or a local leak rate test, as appropriate.

On April 17, 1992, with the unit in cold shutdown, SS-146, which is a 3/4 inch manually operated globe vaive which serves as the outboard Reactor Building isolation valve for the steam generator sampling system, was rebuilt in accordance with a corrective action job order. After completion of the maintenance, the valve was provisionally released to Operations pending completion of the job order's PMT requirements. The PMT requirements specified in the job order included a Local Leak Rate Test (LLRT) and a visual inspection at operating temperature and pressure. However, the "required post-maintenance testing" portion of the "Post Maintenance Testing Hold Form", which was filled out by the cognizant maintenance craftoman, referenced only the visual inspection at operating temperature and pressure. Subsequently, the Operations representative who reviewed the Post Maintenance Testing Hold Form for system/equipment operability requirements failed to identify completion of the PMT requirements for SS-146 as a heatup restraint. The job order was then transferred to the PMT Hold File which is controlled by the Maintenance scheduling group. On May 4, 1992, plant heatup began in preparation for startup and at approximately 0950 RCS temperature was increased above 200 degrees, at which time, Reactor Building integrity was required.

On May 15, 1992, after completion of the visual 'nspection of SS-146 at operating temperature and pressure, a Maintenance supervisor identified that the job order also required a LLRT. Operations was informed that the LLRT had not been performed and at 1630, SS-146 was declared inceperable and the appropriate Technical Specifications action statement was entered. At 1705, the steam generator sampling inboard Reactor Building isolation valves (CV-1820, CV-1826)

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were closed, their circuit breakers were locked open and the action statement was exited. At 1755, a LLRT which indicated zero leakage was completed for SS-146 and the valve was declared operable.

#### C. Root Cause

A detailed evaluation of this event concluded that the existing work control process does not ensure adequate documentation and control of the provisional turnover of equipment from Maintenance to Operations.

### D. Corrective Actions

A multi-discipline Quality Action Team is being organized to evaluate the PMT process and to make recommendations for enhancements to the overall process as well as those to prevent recurrence of similar events. This evaluation will be completed and corrective actions to address the root cause will be identified and implemented prior to the upcoming ANO-2 refueling outage (289) which is scheduled to begin on September 4, 1992.

Interim corrective actions which should prevent recurrence of similar events pending completion of the referenced evaluation include discussion of this event and the lessons learned from it with appropriate Operations and Maintenance personnel. This action will be completed by July 3, 1992.

### E. Safety Significance

The steam generator sampling system inboard Reactor Building isolation valves remained operable during the time that SS-146 remained untested. Additionally, the LLRI which was performed on May 15, 1992 verified that SS-146 was, in fact, operable. Therefore, this condition is considered to be of minimal safety significance.

#### F. Basis For Reportability

Technical Specification 4.4.1.3 states that any major modification or replacement of components affecting the Reactor Building integrity shall be followed by either an Integrated Leak Rate Test or a LLRT, whichever is appropriate. Since SS-1/6 was rebuilt and the plant was subsequently taken to a mode of applicability for containment integrity without a LLRT being performed, this event is reportable pursuant to 10CFR50.73(a)(2)(i)(B) as operation prohibited by the plant's Technical Specifications.

Expires: 4/30/92

#### LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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## G. Additional Information

There have been no previous similar events reported by ANO involving an inadequate turnover of equipment from Maintenance to Operations as a result of inadequate guidance. However, LER 50-313/88-021-00 reported the turnover of an Emergancy Feedwater Pump to Operations from Modifications in an inoperable condition. Corrective actions taken with respect to this LER resulted in significantly tighter controls for transfer of equipment to Operations from Modifications. However, these corrective actions were not effective in preventing the event reported in this LER because they did not affect job orders not related to plant modifications. In addition, the PMT process was not in existence at the time the previous event occurred.

Energy Industry Identification System (EIIS) codes are identified in the text as [XX].