U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos:	50-266, 50-301
License Nos:	DPR-24, DPR-27
Report No:	50-266/97017(DRP); 50-301/97017(DRP)
Licensee:	Wisconsin Electric Power Company, WEPCO
Facility:	Point Beach Nuclear Plant, Units 1 & 2
Location:	6612 Nuclear Road Two Rivers, WI 54241-9516
Dates:	March 4 through August 5, 1997
Inspector:	M. Kunowski, Project Engineer
Approved by:	J. W. McCormick-Barger, Chief Reactor Projects Branch 7

EXECUTIVE SUMMARY

Point Beach Nuclear Plant, Units 1 & 2
NRC Inspection Report 50-266/97017(DRP); 50-301/97017(DRP)

This inspection reviewed an apparent inaccurate statement made to the NRC regarding the capability to cross-connect the Units 1 and 2 component cooling water (CCW) systems. The statement was made while the licensee was requesting a Notice of Enforcement Discretion during repairs of a service water pump and a Unit 1 CCW pump.

Operations

- A violation of 10 CFR 50.9(a) was identified for providing inaccurate information on the status of the CCW cross-connect capability on February 19 and 20, 1997, during the request for the Notice of Enforcement Discretion (Section O2.1).

Maintenance

- A violation of 10 CFR 50, Appendix B, Criterion XI, "Test Control," was identified for the failure to test the CCW pump discharge and suction cross-connect valves to demonstrate the valves would perform satisfactorily (Section M8.1).

- A non-cited violation of Technical Specification 15.3.3.C was identified for the failure to provide two operable CCW pumps to Unit 1 on February 26, 1995 (Section M8.1).

Report Details

Summary of Plant Status

During this inspection period, Unit 1 was in cold shutdown because the licensee decided to voluntarily shut down following an outage to repair two cooling water pumps. Unit 2 was in cold shutdown due to a refueling outage, including replacing the steam generators, and to address performance issues.

I. Operations

O2 Operational Status of Facilities and Equipment

O2.1 Capability to Cross Connect CCW Systems

a. Background and Inspection Scope (71707)

As discussed in Inspection Report 50-266/97003(DRP); 50-301/97003(DRP), a Notice of Enforcement Discretion (NOED) was orally issued to the licensee on Wednesday, February 19, 1997, from specific Technical Specification (TS) requirements related to the inoperability of a Train "A" service water (SW) pump, P-32A, and the Unit 1 Train "A" component cooling water (CCW) pump, 1P-11A. A formal written request for the NOED was documented in a letter to the NRC, received late in the afternoon of February 20, 1997. One of the eight compensatory actions that the licensee offered in the oral request on February 19 and in the written request on February 20 was that the Units 1 and 2 CCW systems had the capability to be cross-connected.

The CCW systems for the two Units were designed to be cross-connected by opening the CCW pump suction valve (CC-722A) and discharge cross-connect valve (CC-722B) as described in the abnormal operating procedures and as shown in Figure 9.3-3, from the Final Safety Analysis Report (FSAR). The cross-connect capability was designed to expedite cooldown of a Unit and to provide single failure protection upon inoperability of one of the three CCW pumps required by TS 15.3.3.C for two-Unit operation. The system could also be cross-connected through the CCW heat exchanger cross-connect valves. However, the latter method was not discussed within the context of the NOED and was not described in station procedures. It is shown in FSAR Figure 9.3-3.

In the morning of Thursday, February 20, a former senior reactor operator (SRO) and shift superintendent raised a concern at the routine plant meeting (6:45 a.m.) that the CCW pump cross-connect valves had been closed with force several years ago and may not operate properly. The plant manager, who attended the meeting, requested that the individual document the concern in a condition report (CR). After the meeting, the ex-SRO received some additional anecdotal information from a current SRO on the same issue. This additional information was factored into the subsequent CR. This potential problem was not discussed in the NOED request sent to the NRC later that afternoon nor was it discussed in telephone conversations between Region III and the licensee that day because the plant manager felt there may not be a problem with the valves based on his experience with the type of valve in question. Further, the Plant Manager desired that the concern be evaluated through the established CR system. He was also aware that a

resident inspector was in attendance at the meeting when the concern was raised and believed that the NRC was aware of the issue.

On Friday, February 21, sometime between 6:45 a.m. and shortly after 10 a.m., the plant manager read the CR written by the ex-SRO and noted that it characterized the problem in stronger terms than those expressed the day before at the plant morning meeting. Around 8:00 a.m., one of the resident inspectors also read a copy of the condition report and subsequently voiced a concern about the operability of the cross-connect function to Region III management. At a 1:00 p.m. plant manager's staff meeting, at which the same resident inspector was present, the plant manager stated that he planned to inform Region III at a scheduled 2:00 p.m. telephone call of the concern with the CCW cross-connect capability as expressed in the CR. During the 2:00 p.m. telephone call, Region III management asked the plant manager about the CR. The plant manager then described the concern.

In a letter dated March 3, 1997, the NRC documented the issuance of the NOED on February 19. In that letter, the NRC stated that information provided on February 19 and 20 may have been misleading because the ability to cross-connect the CCW systems was questionable due to poor cross-connect valve material condition, referring to the concern of the ex-SRO. The NRC referred this potential failure to provide complete and accurate information to the NRC Office of Investigations (OI) for further review. On March 4, the CCW pump discharge cross-connect valve failed to open during a test to specifically open and close the valve; the suction cross-connect valve opened and closed as designed (discussed in Inspection Report 50-266/97003(DRP); 50-301/97003(DRP)). Also, on March 4, and on March 5, OI interviewed personnel at Point Beach regarding their knowledge of the status of the cross-connect capability on February 19 and 20.

The scope of this inspection was to review the transcripts from the OI interviews, the regulatory requirements, the current licensing basis in the FSAR, and other licensee information to assess the appropriate enforcement action. The results of the inspection are discussed below and in Section M8.1.

b. Observations and Findings

10 CFR 50.9(b) specifies a notification period of 2 days for information that has a "significant implication for public health and safety..." Region III personnel were informed by the licensee of the potential problem with the cross-connect valves about 4 hours after the plant manager read the CR on February 21, 1997, and less than 1½ days after the issue was raised orally on February 20. However, while the capability to use the CCW pump cross-connect valves was considered material by Region III in issuing the NOED, the unavailability due to the stuck discharge valve was not considered to hold significant implication for public health and safety, and thus was not reportable under this regulation.

Notwithstanding the lack of a need to report the potential inoperable cross-connect because of the absence of significant implication for public health and safety, 10 CFR 50.9(b) also specifies that the 2-day reporting requirement is not applicable to information which is already required to be provided to the Commission by other reporting requirements. The inoperable cross-connect was properly reported in Licensee Event Report (LER) 97-013 on April 3, 1997, under 10 CFR 50.73(a)(2)(ii)(B), "Any event or condition that resulted in the nuclear power plant being in a condition that was outside the design basis of the plant."

Further, as discussed above, the plant manager did not inform Region III management on February 20 of the potential problem with the cross-connect valves because he believed, based on personal experience with that type of valve, that a large of amount of force was sometimes needed to close those valves but would not necessarily render the valves incapable of being opened again. In addition, earlier, in late 1996, no concerns about valve operability were raised by current operators when the abnormal operating procedure to open the cross-connect valves were written and provided to all of the current operators. The plant manager also expressed at the morning meeting on February 20 that he wanted the concern processed through the condition reporting system. This was done to emphasize to plant staff his expectation that concerns and potential problems were run through the system so that they can receive proper evaluation and disposition.

The plant manager did not notify the Region immediately on February 21, once he read the CR that described the problem as more severe than the initial portrayal on February 20, because as he stated at the 1:00 p.m. meeting with his staff, he intended to notify Region III at the previously scheduled 2:00 p.m. telephone call. Also, the presence of an NRC resident inspector at the morning meeting on February 20 when the concern was first raised and the knowledge that the NRC resident inspectors received copies of all CRs also factored into the plant manager's decision to not notify NRC Region III management until the scheduled telephone call on February 21.

Although the reporting requirement of 10 CFR 50.9(b) was not applicable to this issue, the inspectors identified a violation of 10 CFR 50.9(a). In the oral NOED request made to Region III on February 19 and in the written NOED request received on February 20, the Plant Manager provided inaccurate information in that the Point Beach plant did not have the capability to cross-connect CCW systems of the two Units because of the inoperable pump discharge cross-connect valve. The Plant Manager was unaware of the operating problems with these valves at the time the oral statement was made. The failure to provide complete and accurate information to the NRC on February 19 and 20, 1997, was a violation of 10 CFR 50.9(a), which requires in part, that information provided to the NRC be complete and accurate in all material respects (VIO 50-266/97017-01(DRP); 50-301/97017-01(DRP)).

c. Conclusions

The licensee unwittingly provided inaccurate information about the capability to cross-connect CCW systems of the two Units. A violation of 10 CFR 50.9(a) was identified.

II. Maintenance

M8 Miscellaneous Maintenance Issues (92909)

M8.1 (Closed) LERs 50-266/97-013; 50-301/97-013 and 50-266/97-013-01; 50-301/97-013-01: Component cooling water system not in accordance with plant design basis. LER 97-013 was written to report the inability to cross-connect the CCW systems, via the pump discharge and suction valves (CC-722B and CC-722A), because CC-722B was found to be stuck closed on March 4, 1997. The inspectors determined from discussions with

plant personnel that these valves had not been tested in the past several years (the date of the last test was unknown) to verify that they would open to allow cross-connection of the Units 1 and 2 CCW systems and that the valves were not in any operational test program. The failure to test the CCW pump discharge and suction cross-connect valves was a violation of 10 CFR 50, Appendix B, Criterion XI, "Test Control," which requires, in part, that a test program be established to assure that all testing required to demonstrate that structure, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. The test program shall include operational tests (VIO 50-266/97017-02(DRP); 50-301/97017-02(DRP)). The licensee had abnormal operating procedure (AOP)-9B, "Component Cooling System Malfunction," that provided instructions on using the pump cross-connect valves, but had no procedure for testing the valves and had not tested the valves.

LER 97-013 was subsequently revised and LER 97-013-01 was submitted on May 30, 1997, to document an occurrence on February 26, 1995, when the licensee inappropriately took credit for the assumed cross-connect capability to satisfy the then-extant TS 15.3.3.C requirement for Unit 1 (as an operating Unit) to have two operable CCW pumps assigned to it. At the time, with Unit 2 shutdown, Unit 1 operating at 100 percent, and one of the two Unit 1 CCW pumps out-of-service for seal replacement, the licensee used an operable Unit 2 CCW pump to satisfy the two-pump requirement for Unit 1. The licensee identified the violation as part of corrective actions for the determination on March 4, 1997, that the pump discharge cross-connect valve was inoperable. The violation was corrected when the inoperable Unit 1 pump was returned to service. The failure to have two operable CCW pumps assigned to Unit 1 on February 26, 1995, was a violation of TS 15.3.3.C; however, this non-repetitive, licensee-identified and corrected violation is being treated as a Non-Cited Violation (NCV), consistent with Section VII.B.1 of the NRC Enforcement Policy (NCV 50-266/97017-03(DRP); 50-301/97017-03(DRP)). In August 1997, TS 15.3.3.C was revised to eliminate the dependence on cross-connecting the CCW systems and eliminating the need to routinely test the valves.

V. Management Meetings

X1 Exit Meeting Summary

The inspectors presented the inspection results to members of licensee management at the conclusion of the inspection on August 5, 1997. The licensee acknowledged the findings presented.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

Wisconsin Electric Power Company (WEPCo)

S. A. Patulski, Site Vice President
A. J. Cayia, Plant Manager
D. F. Johnson, Regulatory Services and Licensing Manager
J. G. Schweitzer, Manager, Site Engineering

INSPECTION PROCEDURES USED

IP 71707:	Plant Operations
IP 92909:	Followup-Maintenance

ITEMS OPENED AND CLOSED

Opened

50-266/97017-01; 50-301/97017-01	VIO	Inaccurate information provided regarding CCW cross-connect capability.
50-266/97017-02; 50-301/97017-02	VIO	CCW pump cross-connect valves not tested.
50-266/97017-03; 50-301/97017-03	NCV	TS requirement for two operable CCW pumps not met.

Closed

50-266/97-013; 50-301/97-013 and 50-266/97-013-01; 50-301/97-013-01	LER	Component cooling water system not in accordance with plant design basis.

LIST OF ACRONYMS USED

CFR	Code of Federal Regulations
CCW	Component Cooling Water
CR	Condition Report
DRP	Division of Reactor Projects
EA	Enforcement Action
FSAR	Final Safety Analysis Report
IP	Inspection Procedure
IR	Inspection Report
LER	Licensee Event Report
NCV	Non-Cited Violation
NOED	Notice of Enforcement Discretion
NRC	Nuclear Regulatory Commission
OI	Office of Investigations
PDR	Public Document Room
SRO	Senior Reactor Operator
SW	Service Water
TS	Technical Specification
VIO	Violation
WEPCo	Wisconsin Electric Power Company