NRC FORM 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 04/30/98

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 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.

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

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TITLE (4)
Failure to Verify Closed Primary Containment Isolation Valves as Required by Technical Specification Surveillance Requirements

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
									None	05000
01	30	98	98	005	01	03	30	98	FACILITY NAME	DOCKET NUMBER
									None	05000

OPERATING MODE (9)	4	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)	000		20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)
			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	TELEPHONE NUMBER (Include Area Code)
A. K. Beecher, Operations Support	(217) 935-8881, Extension 3373

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 15 single-spaced typewritten lines) (16)

During the current plant outage, a review of the surveillance requirements contained in Clinton Power Station's (CPS) Technical Specifications (TS) revealed that some primary containment isolation manual valves had not been previously verified closed as required by TS SR 3.6.1.3.2 and TS SR 3.6.1.3.3. The Operations Shift Supervisor established a mode restraint that prevents entering Modes 1, 2, and 3 until this issue is resolved. The cause for this event was personnel error. The corrective actions for this event include verifying the primary containment isolation manual valves closed, revising appropriate procedures, and performing an ongoing review to ensure the Technical Specification Surveillance Requirements are being adequately implemented by CPS procedures.

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

DESCRIPTION OF EVENT

In an effort to ensure that Clinton Power Station's (CPS) Technical Specifications (TS), Operational Requirements Manual (ORM), and Offsite Dose Calculation Manual (ODCM) are being adequately implemented, Clinton Power Station assembled a Technical Specification Surveillance Test Program Review (TSSTPR) team. The objective of the TSSTPR team was to verify that appropriate Surveillance Procedures, scheduling programs and triggering mechanisms were in place to ensure compliance with the TS, ORM, and ODCM testing and surveillance requirements. On January 22, 1998, the TSSTPR team identified an apparent omission of primary containment isolation manual valves [ISV] from surveillance procedures that satisfy TS SR 3.6.1.3.2 and TS SR 3.6.1.3.3 for periodic position verification. Condition Report 1-98-01-283 was written to track this issue. The Operations Shift Supervisor (SS) directed that an investigation be performed to determine if other plant procedures adequately implemented TS SR 3.6.1.3.2 and TS SR 3.6.1.3.3 for these valves. Additionally, the SS established a mode restraint that prevents entering Modes 1, 2, or 3 until this issue is resolved.

On January 30, 1998, the investigation confirmed that there were primary containment isolation manual valves that had not met the verification requirements of TS SR 3.6.1.3.2 and 3.6.1.3.3. On January 30, 1998, the plant was in Mode 4, COLD SHUTDOWN, and the sixth refueling outage (RF-6) was in progress. Reactor [RCT] coolant temperature was being maintained between 95 and 115 degrees Fahrenheit and pressure was atmospheric.

TS 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)," Limiting Condition for Operation (LCO) states that each PCIV shall be operable during modes 1, 2, and 3. Additionally, this LCO is applicable during Modes 4 and 5 for Residual Heat Removal (RHR) shutdown cooling system suction isolation valves from the reactor vessel when associated isolation instrumentation is required to be operable per Function 5.c of LCO 3.3.6.1 "Primary Containment and Drywell Isolation Instrumentation." Furthermore, TS LCO 3.6.1.3 is applicable for secondary containment bypass leakage isolation valves during core alterations, movement of irradiated fuel assemblies in the primary or secondary containment, and during operations with a potential for draining the reactor vessel. Since the primary containment isolation manual valves that were identified by the TSSTPR team as not having sufficient surveillance procedures to satisfy the requirements of TS SR 3.6.1.3.2 and TS SR 3.6.1.3.3 were not RHR suction isolation valves or secondary containment bypass leakage valves, their TS operability requirement is only applicable for Modes 1, 2, and 3.

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TS SR 3.6.1.3.2 requires that each primary containment isolation manual valve and blind flange that is located outside primary containment, drywell, and steam tunnel, that is required to be closed during accident conditions, be verified closed every 31 days. Exceptions to this 31 day requirement include valves and blind flanges in high radiation areas that are verified closed by administrative means and primary containment isolation manual valves that are open under administrative controls. The following valves were not verified closed every 31 days as required by TS SR 3.6.1.3.2 while the plant was in Modes 1, 2, and 3:

- 1CM080A Outboard Isolation ILRT Sensing Line
- 1CM080B Outboard Isolation ILRT Sensing Line
- 1CM080C Outboard Isolation ILRT Sensing Line

TS SR 3.6.1.3.3 requires that each primary containment isolation manual valve and blind flange that is located inside primary containment, drywell, or steam tunnel that is required to be closed during accident conditions be verified closed prior to entering Mode 2 or 3 from Mode 4, if not performed within the previous 92 days. The following valves were not verified closed prior to entering Mode 2 or 3 from Mode 4:

- 1F42-F304A IFTS Test Connection
- 1F42-F304B IFTS Test Connection
- 1E12-F044A Upper Pool S/D Cooling Header A Flush Water Supply
- 1E12-F044B Upper Pool S/D Cooling Header B Flush Water Supply

No automatic or manually initiated safety system responses were necessary to place the plant in a safe and stable condition. This event was not affected by other inoperable equipment or components.

CAUSE OF EVENT

The cause for this event was determined to be personnel error. During the investigation into this event it could not be positively determined why valves 1CM080A, 1CM080B, 1CM080C, 1E12-F044A, and 1E12F044B were omitted from appropriate implementing surveillance procedures. Surveillance procedures implement the position verification requirements for primary containment manual isolation valves contained in the Technical Specifications. Although valves 1CM080A, 1CM080B, 1CM080C, 1E12-F044A, and 1E12F044B were controlled in system procedures and locked-valve procedures, these valves were not included in appropriate surveillance procedures. This may have been due to either a misunderstanding of the proper implementing procedures or an oversight in addressing the complete scope of applicable valves in the plant surveillance procedures.

A specific contributing factor for not including valves 1F42-F304A and 1F42-304B in the surveillance procedure was inadequate skills/training. Valves 1F42-F304A and 1F42-304B were installed using the plant modification process in 1995, however; they were not added to the appropriate surveillance procedure that implements the requirements of TS SR 3.6.1.3.3. The individual who performed the plant modification impact assessment for the Operations Department was not thoroughly familiar with Technical Specification Surveillance

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Requirements.

CORRECTIVE ACTION

As an interim corrective action, the primary containment isolation valves that had not been verified in accordance with the requirements of TS SR 3.6.1.3.2 and 3.6.1.3.3 were verified closed.

The applicable surveillance procedures will be revised to include periodic verification that these valves are in the closed position as required by the Improved Technical Specifications.

CPS procedure 1001.05, "Authorities and Responsibilities of Reactor Operators for Safe Operation and Shutdown," will be revised to require Operations to assign the performance of plant modification impact assessments to a SRO whenever a modification is to a safety or safety related system.

CPS is performing an ongoing review to ensure the Technical Specification Surveillance Requirements are adequately implemented in CPS surveillance procedures.

ANALYSIS OF EVENT

This event is reportable under the provision of 10CFR50.73(a)(2)(i)(B). TS SR 3.6.1.3.2 and TS SR 3.6.1.3.3 were not met for the primary containment manual isolation valves identified in the DESCRIPTION OF EVENT portion of this report.

An assessment of the safety consequences has determined that this event is not nuclear safety significant. Illinois Power(IP) believes that all of the valves identified in this LER were in their required closed position per TS SR 3.6.1.3.2 and 3.6.1.3.3. The applicable system lineup for these valves requires them to be in the closed position during normal plant operation. Additionally, as a corrective action for this event, a lineup verification was performed on these valves and all were found in their required closed position. While this event was not nuclear safety significant, IP considers inadequate configuration control a serious safety issue.

ADDITIONAL INFORMATION

No equipment or components failed as a result of this event.

IP has not recently reported other events where Primary Containment Isolation Manual Valves where not included in surveillance procedures due to personnel error.

For further information regarding this event, contact A. K. Beecher, Operations Support, at (217) 935-8881, extension 3373.