

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) PLANT VOGTLE - UNIT 2	DOCKET NUMBER (2) 0 5 0 0 0 4 2 5 1	PAGE (3) 0704
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TITLE (4)  
VALVE CLOSURE LEADS TO NON-COMPLIANCE WITH TECHNICAL SPECIFICATIONS

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)
03	19	89	89	011	00	04	21	89	Plant Vogtle - Unit 1			0 5 0 0 0 4 2 4

OPERATING MODE (9) 3	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §. (Check one or more of the following) (11)									
POWER LEVEL (10) 0 0 0	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)						
	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)						
	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)(ix)								

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER	
NAME R. M. ODOM, NUCLEAR SAFETY AND COMPLIANCE		AREA CODE 4 0 4 8 2 6 - 3 2 0 1	

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS		

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

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

Technical Specification 3/4.5.2 requires that the Safety Injection (SI) Cold Leg Injection valve, HV-8835 be open while in Modes 1, 2 and 3.

On 3-19-89, at 2033 CST, the shift operating crew closed the Safety Injection (SI) pump cold leg injection valve to the Reactor Coolant System (RCS) cold legs (2-HV-8835) while performing the system operating procedure to fill SI accumulators at low RCS pressure in Mode 3. Closure of this valve prevents both SI pumps from being capable of providing automatic injection to the RCS cold legs upon receipt of a SI actuation signal. On 3-26-89, while considering LER 2-89-003 (both trains of Residual Heat Removal rendered inoperable due to common valve manipulations) and similar situations for other safety-related systems, a shift supervisor realized that the system operating procedure for filling SI accumulators at low RCS pressure required closure of 2-HV-8835 while in Mode 3. Upon discovering this, a review of the Unit 1 and Unit 2 accumulator fills was initiated. Nine separate instances were identified for Unit 1 when 1-HV-8835 was closed while in Mode 3, in addition to the single occurrence on Unit 2, specified previously.

The cause of these events is inadequate procedures which did not prevent closure of HV-8835 during Mode 3 or require accumulator fill prior to Mode 3 entry. The procedures are being changed to correct these inadequacies.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)  PLANT VOGTLE - UNIT 2	DOCKET NUMBER (2)  0 5 0 0 0 4 2 5	LER NUMBER (6)			PAGE (3)	
		YEAR 8 9	SEQUENTIAL NUMBER - 0 1 1	REVISION NUMBER - 0 0	0 2	OF 0 4

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

A. REQUIREMENT FOR REPORT

This report is required per 10CFR50.73(a)(2)(i) because the unit operated in Mode 3 with Safety Injection Pump Cold Leg Injection valve HV-8835 closed, a condition outside of Technical Specification (TS) 3/4.5.2 requirements.

B. UNIT STATUS AT TIME OF EVENT

At the time of this event on 3-19-89, Unit 2 was operating in Mode 3 (Hot Standby) at 0% rated thermal power. Reactor Coolant System (RCS) pressure and temperature was at approximately 500 psig and 375 degrees F. The operating crew had initiated a RCS heatup to a plateau of 950 psig and 450 degrees F. Other than ECCS, there was no inoperable equipment which contributed to the occurrence of this event.

C. DESCRIPTION OF EVENT

Technical Specification 3/4.5.2 and surveillance requirement 4.5.2a. require that valve HV-8835, the Safety Injection (SI) Pump Cold Leg Injection valve, be open with its associated power lock out switch in the lock out position while in Modes 1, 2, and 3.

On 3-19-89, at 2033 CST, while in Mode 3 while Reactor Coolant System pressure at 500 psig. Work was in progress to clear existing mode restraint items. The shift crew was directed to initiate a RCS heatup to a plateau of 950 psig and 450 degrees F. The reactor operator was instructed to fill and pressurize the SI accumulators in accordance with the system operating procedures. The system operating procedure included a note regarding SI system operability requirements. However, the note was worded in such a way that it gave direction as to when to perform the low RCS pressure accumulator fill, rather than when not to perform the fill. At 2033 CST, on 3-19-89, the operating crew closed valve 2-HV-8835 to the RCS cold legs in accordance with procedure 13105-2, "Safety Injection System", for fill of SI accumulators at low RCS pressure. At 2115 CST, on 3-19-89, the SI accumulator fill was completed and 2-HV-8835 was reopened and its associated power lock out switch taken to the lock out position.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		0 1   1	0 0	0 0	0 3	OF	0 4

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

On 3-26-89, while considering LER 2-89-003 (both trains of Residual Heat Removal rendered inoperable due to common valve manipulations) and similar situations for other safety-related systems, a shift supervisor realized that both the Unit 1 and Unit 2 system operating procedures required closing the SI pump cold leg injection valve while filling SI accumulators at low RCS pressure. He also realized that the accumulators were not required to be operable until RCS pressure was in excess of 1000 psig in Mode 3, and the potential existed for HV-8835 to be closed while in Mode 3, thus failing to comply with TS 3/4.5.2

Upon discovering this, a review was initiated for prior Unit 1 and Unit 2 accumulator fills. Nine separate instances were identified where 1-HV-8835 was closed while in Mode 3. These instances occurred on the following dates:

- |                   |                    |
|-------------------|--------------------|
| 3-18-87           | 2-8-88             |
| 5-20-87 (2 times) | 11-23-88 (3 times) |
| 10-29-87          | 1-26-89            |

The instance previously described was the only occurrence for Unit 2.

D. CAUSE OF EVENTS

The cause of these events was inadequate procedures. Procedures 13105-1 and 13105-2, "Safety Injection System", provide instruction for filling accumulators but restrictions for filling while in Mode 3 were confusing and inadequate. Also, procedure 12002-C, "Unit Heatup To Normal Operating Temperature and Pressure (Mode 4 To Mode 3)" does not require accumulator fill to be completed prior to Mode 3 entry.

E. ANALYSIS OF EVENTS

While valve HV-8835 valve is closed, the safety injection pumps are unable to automatically provide flow into the reactor vessel and manual action would have been necessary to provide flow. However, the centrifugal charging pumps and residual heat removal pumps were available to automatically provide flow into the reactor vessel. The nine Unit 1 events represent a total of 5 hours, 51 minutes, that 1-HV-8835 was closed during Mode 3. The safety risk imposed by this condition is considered to be small due to the relatively short period of time involved. The 42 minutes that 2HV-8835 was closed has no safety significance because Unit 2 had not yet achieved initial criticality and there was no radioactive decay heat in the reactor core. Finally, no event occurred in either unit which required actuation of safety injection during the time periods involved. Based on these considerations, there was no adverse affect to plant safety or to public health and safety as a result of these events.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR 8   9	SEQUENTIAL NUMBER -   0   1   1	REVISION NUMBER -   0   0	0   4	OF 0   4

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

F. CORRECTIVE ACTIONS

1. The inadequate restrictions in procedures 13105-1 and 13105-2 were changed to precise caution statements which direct operators not to perform the low RCS pressure accumulator fill process while in Mode 3. An alternative fill process is being reviewed which would not require closure of HV-8835 while at low RCS pressure. This review will be completed by May 21, 1989.
2. Procedure 12002-C was revised to include a sign off ensuring that SI accumulator fill is completed prior to Mode 3 entry.
3. A copy of this LER will be placed in the Operations Required Reading Book.
4. A copy of this LER and all reference documents will be sent to the Training department for evaluation of inclusion into the Operator Requalification Program.

G. ADDITIONAL INFORMATION

1. Failed Components  
None
2. Previous Similar Events  
None
3. Energy Identification System Code  
Safety Injection - BQ

Georgia Power Company  
333 Piedmont Avenue  
Atlanta, Georgia 30308  
Telephone 404 526-3195

Mailing Address:  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
Telephone 205 868-5581

W. G. Hairston, III  
Senior Vice President  
Nuclear Operations

*The Southern Electric System*  
ELV-00451  
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April 21, 1989

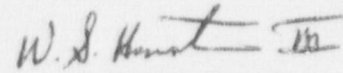
U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

PLANT VOGTLE - UNIT 2  
NRC DOCKET 50-425  
OPERATING LICENSE NPF-81  
LICENSEE EVENT REPORT  
VALVE CLOSURE LEADS TO  
NON-COMPLIANCE WITH TECHNICAL SPECIFICATIONS

Gentlemen:

In accordance with 10 CFR 50.73, Georgia Power Company hereby submits the enclosed report related to an event which was discovered on March 26, 1989.

Sincerely,



W. G. Hairston, III

TEW/PAH/gm

Enclosure: LER 50-425/1989-011

xc: Georgia Power Company  
Mr. P. D. Rice  
Mr. C. K. McCoy  
Mr. G. Bockhold, Jr  
Mr. M. Sheibani  
Mr. J. P. Kane  
NORMS

U. S. Nuclear Regulatory Commission  
Mr. S. Ebnetter, Regional Administrator  
Mr. J. B. Hopkins, Licensing Project Manager, NRR  
Mr. J. F. Rogge, Senior Resident Inspector, Vogtle

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