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

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EXPIRES 04/30/98

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS 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

LICENSEE EVENT REPORT (LER)

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

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Point Beach Nuclear Plant, Unit 1	05000266	1 of 5

TITLE (4)

Missed ASME Section XI Pressure Test Program Surveillances

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
									Unit 2	05000301
03	30	1998	1998	- 012 -	00	04	29	1998	FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)	N	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
			20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)		or in NRC Form 366A

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Charles W. Krause, Senior Regulatory Compliance Engineer	(920) 755-6809

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

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)

On March 30, 1998, while Point Beach Nuclear Plant (PBNP) Unit 1 was in a refueling shutdown condition and Unit 2 was operating at 75 percent power, Wisconsin Electric determined that twenty-seven containment penetration pressure tests required by the Section XI pressure test program had not been conducted in accordance with the ASME Section XI Code and were, in fact, missed surveillances. Pressure testing of these penetrations has been conducted in accordance with licensee's 10 CFR 50 Appendix J program; however, the relief request to permit the alternative test was not submitted to the NRC in a timely manner and has not yet been approved by the NRC. The cause of the missed surveillances was inadequate program monitoring and management that resulted in using the relief request provisions prior to submittal to or approval by the NRC. A relief request (PTP-3-02) was submitted on December 16, 1997.

Event Description:

Point Beach Nuclear Plant (PBNP) Technical Specification (TS) 15.4.2.B.1 states that inservice inspection (ISI) of ASME Code Class 1, Class 2 and Class 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(g) modified by 10 CFR 50.55a(b), except when specific written relief is granted by the NRC pursuant to 10 CFR 50.55a(g)(6)(1). For the Third Inspection Interval PBNP is committed to the 1986 Edition of ASME Section XI with no Addenda. On March 24, 1998, a condition report was written which stated that, contrary to this specification, containment penetration piping for twenty-seven (27) containment penetrations had not been pressure tested in accordance with Table IWC 2500-1, during the first period of the Third Inspection Interval. These penetrations had been pressure tested in accordance with the licensees 10 CFR 50 Appendix J containment pressure testing program; however, the relief request that would authorize this alternative testing program (PTP-3-02) has not been approved by the NRC. On March 30, 1998, the licensee determined this condition constituted a missed surveillance. This condition is reportable in accordance with 10 CFR 50.73(a)(2)(i)(b) as an "operation prohibited by the plant's Technical Specifications."

The PBNP ISI Basis Document classifies containment penetration piping as ASME Class 2 in those systems where the balance of the system piping would normally be outside of the scope of Section XI. The purpose of this classification is to ensure that containment integrity for the containment penetration portions of those systems is periodically demonstrated. ASME Section XI, Table IWC-2500-1 Category CH, requires 40-month system pressure tests to be conducted on the pressure retaining portions of all Class 2 systems. The PBNP Pressure Test Program exempted this piping (see penetration list under component and system description) from ASME Section XI testing based on Relief Request PTP-3-02 that would permit alternative testing via 10 CFR 50 Appendix J. During the first period of the Third Interval, approval for PTP-3-02 was not obtained from the NRC. The relief request was supposed to have been submitted in January, 1994, with a Pressure Testing Program update. A search of licensee correspondence cannot substantiate that this revision and relief request had been submitted. Therefore, ASME Section XI requirements were not being met and alternative testing under an Appendix J program had not been approved. An updated copy of the Third Interval ASME Section XI Pressure Test Program, which included program Relief Request PTP-3-02 was submitted to the NRC on December 16, 1997.

Cause:

The cause of this event was the failure of the IST program personnel to follow-up on the presumed submittal of the program relief request in 1994 and to validate that the request had been approved by the NRC before accepting the results of the alternative Appendix testing.

Corrective Actions:

1. An operability determination was completed on October 31, 1997, when it was first discovered that relief request PTP-3-02 had not been submitted (Condition Report 97-3593). The operability determination concluded that the piping associated with the affected penetrations is tested under the licensees 10 CFR 50 Appendix J Program, and leakage detected during the tests is evaluated and dispositioned in accordance with that program. Since the intent of the ASME Section XI program requirements are met by the Appendix J program and all the penetrations have met the leakage criteria of Appendix J and PBNP TS, it was concluded that the penetrations were operable.

2. A revision to the Third Interval Pressure Testing Program, including a relief request to permit use of the 10 CFR 50 Appendix J containment penetration testing program in lieu of the ASME Section XI pressure test, was submitted for NRC review and approval on December 16, 1997.

3. A root cause evaluation of the reasons for missing ASME Section XI 40-month pressure tests was initiated after discovery of the conditions identified in LER 266/98-001-00 dated February 2, 1998. While this RCE does not directly address the specifics of the missed surveillance discussed in this LER, the underlying causes for these events appear to be related. Contributing factors for these problems are: (1) inadequate program monitoring and management; and (2) lack of commitment to the program via sufficient and knowledgeable program staffing. Additional corrective actions will be identified by this RCE and will be monitored and managed under the corrective action process.

Component and System Description:

The function of the containment penetrations is to provide a transition path for the identified system from inside the containment structure to that portion of the system outside the containment. The safety function of the affected piping and valves that make up the containment penetration pressure boundary is to provide a barrier between containment and the atmosphere to maintain maximum allowable primary containment leakage rate to atmosphere to less than L_a (maximum allowable containment leak rate). L_a is defined as 0.4% of containment air weight per day. In addition, the containment leakage rate testing (Appendix J) program limits leakage from any single penetration to 2000 sccm.

Following is a listing of those penetrations which are classified as ASME Class 2 for the purposes of ASME Section XI Table IWC-2500-1 containment penetration testing. Included with the table is the year of the most recent Appendix J program test.

Penetration Number	Last Tested	Description
1P33A	1996	(UNIT 1)INSTRUMENT AIR TO CONTAINMENT
2P33B	1996	(UNIT 2)INSTRUMENT AIR TO CONTAINMENT
1P52	1996	HEATING STEAM TO CONTAINMENT
1P53	1996	CONDENSATE RETURN FROM HEATERS
2P52	1995	PIPE PENETRATION - SPARE
2P53	1995	PIPE PENETRATION - SPARE
1P-V1	1996	PURGE EXHAUST
1P-V2	1996	PURGE SUPPLY
1P28D	1997	DEADWEIGHT TESTER
2P-V1	1996	PURGE EXHAUST
2P-V2	1996	PURGE SUPPLY
1P-X1	1996	SUPPLY TO RE-211 AND RE-212
1P-X2	1996	RETURN FROM RE-211 AND RE-212
2P-X1	1995	SUPPLY TO RE-211 AND RE-212
2P-X2	1995	RETURN FROM RE-211 AND RE-212
1P31A	1996	PRESSURE TRANSMITTER
1P14B	1996	PRESSURE TRANSMITTER
1P32A	1996	PRESSURE TRANSMITTER
1P31B	1996	POST-ACCIDENT CONTAINMENT VENT (PACVS) SAMPLE
1P31C	1996	PACVS EXHAUST
1P25C	1996	PACVS SUPPLY
2P31A	1995	PRESSURE TRANSMITTER
2P14B	1995	PRESSURE TRANSMITTER
2P32A	1995	PRESSURE TRANSMITTER
2P31B	1996	PACVS SAMPLE
2P31C	1995	PACVS EXHAUST
2P42C	1995	PACVS SUPPLY

Safety Assessment:

As discussed in the event description, the piping penetrations identified in the table above are classified in the PBNP ISI bases document as ASME Class 2 in order to ensure that containment integrity for these piping sections is periodically demonstrated. The balance of the piping in these systems is outside the scope of Section XI. For Class 2 systems, ASME Section XI requires an inservice leak test be conducted every 40 months. The purpose of the 40-month test is to verify integrity of the system at normal operating pressure and check for leakage. Any leakage that is detected must be evaluated and repairs conducted based upon the evaluation.

Piping associated with all of the affected penetrations has been tested under the 10 CFR 50 Appendix J Program. This verifies the safety function of that piping, which is to maintain containment integrity. All of the piping associated with these penetrations was verified to be in the Appendix J Program. The table above lists the penetrations subject to these tests and the date of the most recent Appendix J test.

Any leakage detected during these tests is evaluated and dispositioned in accordance with the Appendix J Program and the PBNP Technical Specifications. These tests have satisfied all applicable acceptance criteria.

No degradation of the penetration pressure boundaries were identified or discovered during the TS surveillance or preventative maintenance. Therefore, the health and safety of the public and plant personnel was not compromised by these missed ASME Section XI surveillances.

System and Component Identifiers

The Energy Industry Identification System component function identifier for each component/system referred to in this report are as follows:

Component/System	Identifier
Instrument Air	LD
Containment Heating and Ventilation	VA
Post Accident Containment Venting	VA
Containment Penetrations	NH

Similar Occurrences:

A search for similar PBNP Licensee Event Reports submitted within the past eight years was conducted. One LER (266/1998-001-00) dated February 2, 1998, was identified. This LER reported on the discovery of five 40-month ASME Section XI pressure test that were not performed within the required time frame.