

ARKANSAS POWER & LIGHT COMPANY

May 21, 1989

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U. S. Nuclear Regulatory Commission Document Control Desk Mail Station P1-137 Washington, D.C. 20555

SUBJECT: Arkansas Nuclear One - Unit 2

Docket No. 50-368 License No. NPF-6

Licensee Event Report No. 50-368/89-007-00

Gentlemen:

In accordance with 10CFR50.73(a)(2)(i), attached is the subject report concerning the failure to reinstall a snubber following maintenance work due to inadequate work controls which resulted in operation prohibited by Technical Specifications.

Very truly yours,

E.C. EWING / AM James

E. C. Ewing General Manager, Plant Support

ECE: DAH: sgw attachment

cc w/att: Regional Administrator

Region IV

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NRC Form 366 (9-83)

U.S. Nuclear Regulatory Commission Approved OMB No. 3150-0104 Expires: 8/31/85

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Arkansas Nuclear One, Unit Two | DOCKET NUMBER (2) | PAGE (3) 0|5|0|0|0| 3| 6| 8|1|0F|0|3 TITLE (4) Failure to Reinstall Snubber Following Maintenance Work Due to Inadequate Work Controls Results in Operation Prohibited by Technical Specifications LER NUMBER (6) EVENT DATE (5) REPORT DATE (7) OTHER FACILITIES INVOLVED (8) Sequential Revision Month! Day | Year | Year Number Number | Month | Docket Number(s Facility Names Year 8| 9| 8| 9|--| 0| 0| 7|--| 0| 0| 0| 5| 2| 1| 8| 9| |THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: 1015101010 OPERATING MODE (9) (Check one or more of the following) (11) POWERI 20.402(b) 20.405(c) 50.73(a)(2)(iv) 73.71(b) LEVELI 20.405(a)(1)(i) 73.71(c) 50.73(a)(2)(v) 50.36(c)(1) 20.405(a)(1)(ii) 50.36(c)(2) (10) |0|0|0 50.73(a)(2)(vii) Other (Specify in 50.73(a)(2)(i) 20.405(a)(1)(iii) XI 50.73(a)(2)(viii)(A) Abstract below and 20.405(a)(1)(iv) 50.73(a)(2)(ii) 50.73(a)(2)(viii)(B) in Text, NRC Form 50.73(a)(2)(x) 20.405(a)(1)(v) 50.73(a)(2)(iii) 366A) LICENSEE CONTACT FOR THIS LER (12) Name Telephone Number Area Larry A. Taylor, Nuclear Safety and Licensing Specialist Code 5|0|1|9|6|4|-|3|1|0|0 COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT Reportablel [Reportable] to NPRDS Component Manufacturer Cause | System | Component Manufacturer | to NPRDS SUPPLEMENT REPORT EXPECTED (14) EXPECTED Month Day Year SUBMISSION Yes (If yes, complete Expected Submission Date) $|\bar{X}|$ No DATE (15) ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On April 24, 1989, while performing inservice inspections of mechanical snubbers as required by the plant's Technical Specifications (TS), it was identified that a snubber on a valve (2CV-4653) on the pressurizer spray line was disconnected. A review of past work on the valve revealed that the snubber was most probably left disconnected during maintenance work performed in May 1988 while ANO-2 was shutdown in a refueling outage. Following the discovery of this event, the snubber on 2CV-4653 was replaced. An engineering evaluation of the disconnected snubber was completed on April 25, 1989, which concluded that the pressurizer spray system would have remained operable during the time the snubber was removed. The cause of this event was determined to be inadequate work controls. The job order which was issued to accomplish the valve repair did not contain enough detail to ensure proper completion of the job considering the potential impact of the work on plant safety equipment. As a result of a previous event, procedure changes have been implemented addressing work control improvements. These changes include written logs for turnover of job activities and improved criteria for requirements of work plan development or increased detail in job instructions. Additionally, management has reemphasized the overall responsibilities of maintenance to properly complete work before release and return to service. These actions should minimize the recurrence of an event of this type.

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A. Plant Status

At the time of discovery of this event on April 24, 1989, Arkansas Nuclear One, Unit 2 (ANO-2) was in Operational Mode 5 (Cold Shutdown) with Reactor Coolant System (RCS) temperature at approximately 123 degrees Fahrenheit and RCS pressure at approximately 18 psia.

B. Event Description

On April 24, 1989, while performing inservice inspections of mechanical snubbers as required by the plants's Technical Specifications (TS), it was identified that snubber [SNB] 2CCA-15-H34 was disconnected from valve 2CV-4653 on the pressurizer [AB] spray line. A review of past work on the valve revealed that the snubber was most probably left disconnected during maintenance work performed in May 1988, while ANO-2 was shutdown in a refueling outage. The snubber had been disconnected to replace the packing on valve 2CV-4653 and then apparently was never reconnected. Three other snubbers on three valves had also been removed under the same maintenance job order.

Removal of the snubbers to replace the packing on these valves was not identified as being necessary to perform the activity during the initial planning of the job order. However, once work was begun in accordance with the job order, it was identified that the snubbers would have to be removed to gain access to the valve packing. The removal and replacement of the snubbers was added to the scope of the job order and work proceeded. Apparently, following the completion of work on valve 2CV-4653, the snubber was not replaced and this was not recognized prior to closing the job order. Additionally, a review of the job order identified that visual inspections required by the job order were not performed for any of the snubbers removed.

C. Safety Significance

The valves and snubbers involved in this event are located on the pressurizer spray system. The pressurizer spray system is part of the RCS and supplies RCS water to the pressurizer spray nozzle from either of two reactor coolant pumps. The engineering evaluation performed as a result of the disconnected snubber determined that the pressurizer spray system remained operable and the RCS piping seismic qualification was not significantly affected. Therefore, this event is not considered safety significant.

D. Root Cause

The cause of this event was determined to be inadequate work controls. The job order which was issued to accomplish the valve repair did not contain enough detail to ensure proper completion of the job considering the rotential impact of the work on plant safety equipment. The critical steps to ensure that the snubbers were properly installed at the completion of the job were not adequately controlled by the job order.

E. Basis for Reportability

TS 3.7.8 requires that all snubbers be Operable. With a snubber inoperable, within 72 hours the inoperable snubber must be replaced or restored to Operable status and an engineering evaluation performed, or the attached system must be declared inoperable and the appropriate Action Statement for the system must be followed. As a result of this event, the snubber had been unknowingly disconnected for almost one year. Therefore, the snubber was not restored to Operable status within 72 hours and the pressurizer spray line had not been declared inoperable.

F. Corrective Actions

Following the discovery of this event, the snubber on 2CV-4653 was replaced and the other three snubbers were inspected. Additionally, an engineering evaluation of the disconnected snubber was completed on April 25, 1989, which concluded that the pressurizer spray system would have remained operable during the time the snubber was removed.

As a result of a previous event (see Additional Information), procedure changes have been implemented addressing work control improvements. These changes include written logs for turnover of job activities and improved criteria for requirements of work plan development or increased detail in job instructions. Additionally, management has reemphasized the overall responsibilities of maintenance of properly complete work before release and return to service. These actions should minimize the recurrence of an event of this type.

MRC*Form 366A (9-83) Form 1062.01B U.S. Nuclear Regulatory Commission Approved OMB No. 3150-0104 Expires: 8/31/85

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Arkansas Nuclear One, Unit Two			
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G. Additional Information

A previous event involving inadequate work controls was documented by LER 50-313/88-023. On December 16, 1988, during the performance of a post maintenance leak test on a manual isolation valve, a non-isolable RCS leak developed due to the failure to tighten the valve packing retainer. The root cause of this event was determined to be inadequate work controls. The job orders which were issued to accomplish the valve repair did not contain enough detail to ensure proper completion of the job without incident considering the plant conditions during performance of the activity, the potential impact of the work on plant and personnel safety, and the type of personnel involved in the activity.

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