

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8801200325 DOC.DATE: 88/01/15 NOTARIZED: NO DOCKET #  
 FACIL:50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397  
 AUTH.NAME AUTHORITY AFFILIATION  
 WASHINGTON,S.L. Washington Public Power Supply System  
 POWERS,C.M. Washington Public Power Supply System  
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 87-033-00:on 871218,Tech Spec violation caused by missed  
 ASME valve operability surveillances due to personnel error.  
 W/8 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 5  
 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

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NRR/DRIS/SIB	1 1	NRR/PMAS/ILRB	1 1
REG FILE 02	1 1	RES TELFORD,J	1 1
RES/DE/EIB	1 1	RES/DRPS DIR	1 1
RGN5 FILE 01	1 1		
EXTERNAL: EG&G GROH,M	5 5	FORD BLDG HOY,A	1 1
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## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Washington Nuclear Plant - Unit 2	050003197	1 OF 04

TITLE (4) Plant Technical Specification Violation Caused by Missed ASME Valve Operability Surveillances Due to Personnel Error

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)				
1	2	1	8	8	7	8	7	0	3	3	0	5	0	0	0
1	2	1	8	8	7	8	7	0	3	3	0	5	0	0	0

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																					
POWER LEVEL (10)	0	1	9	14	20.402(b)	20.405(a)(1)(i)	20.405(a)(1)(ii)	20.405(a)(1)(iii)	20.405(a)(1)(iv)	20.405(a)(1)(v)	20.405(a)(2)(i)	20.405(a)(2)(ii)	20.405(a)(2)(iii)	50.73(a)(2)(iv)	50.73(a)(2)(v)	50.73(a)(2)(vii)	50.73(a)(2)(viii)(A)	50.73(a)(2)(viii)(B)	50.73(a)(2)(ix)	73.71(b)	73.71(c)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)	

## LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
S.L. Washington, Compliance Engineer	510 931 7171 - 20810

## 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)

YES (If yes, complete EXPECTED SUBMISSION DATE)	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	X				

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

On December 16, 1987, while performing an Operational Quality Assurance Surveillance, a Plant Quality Assurance engineer discovered a condition that potentially violated WNP-2 Plant Technical Specifications. The surveillance information was given to a Plant engineer who determined, on December 18, 1987 that WNP-2 Plant Technical Specification Sections 4.0.5, ASME valve in-service testing requirements, and 3.6.3, primary containment valve operability requirements, for the Post Accident Sampling System (PASS) had on two occasions not been met.

During the 1986 and 1987 Spring refueling and maintenance outages, the PASS Process Sample Radiation (PSR) primary containment isolation valve ASME in-service testing surveillance was not performed prior to Plant startup. The surveillance interval allowable by WNP-2 Plant Technical Specification 4.0.2 was exceeded and, therefore, changing to Operational Modes 1, 2, or 3 from Operational Mode 4 was not allowed by Technical Specification 3.6.3 since the PSR valves were by technical specification requirements inoperable. The two time periods when the Plant was not in compliance with Technical Specifications were from June 4, 1986 to July 12, 1986 and from August 1, 1987 to August 10, 1987.

The cause of this event is personnel error in that Plant Chemistry personnel assumed responsibility for the "PSR Valve Operability" surveillance without adequately understanding the surveillance requirements.

At the time of discovery, the Plant was in compliance with these Technical Specification Sections and no immediate corrective action was required. Corrective actions to be taken to prevent recurrence of this event include: training for applicable personnel on the PSR Valve Operability Technical Specification surveillance requirements, a procedure revision that will include more guidance on surveillance completion requirements, and reinstruction on the requirements in the Plant procedure governing Technical Specification surveillance performance.

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PDR ADOCK 05000397  
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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104  
EXPIRES: 8/31/88

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Washington Nuclear Plant - Unit 2	05000397	87	033	0	02	OF	04

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

Abstract (Continued)

There is no safety significance associated with this event since subsequent surveillances verified the operability of these valves.

Plant Conditions

- a) Power Level - 94%
- b) Plant Mode - 1 (Power Operation)

Event Description

On December 16, 1987, while performing an Operational Quality Assurance Surveillance, a Plant Quality Assurance engineer discovered a condition that potentially violated WNP-2 Plant Technical Specifications. The surveillance information was given to a Plant engineer who determined on December 18, 1987 that WNP-2 Plant Technical Specification Sections 4.0.5, ASME valve in-service testing requirements, and 3.6.3, primary containment valve operability requirements, for the Post Accident Sampling System (PASS) had on two occasions not been met.

The Plant PASS is designed for obtaining both primary liquid and gaseous samples. The PASS sample lines from the Primary Reactor Containment are required to be isolable and 20 Process Sample Radiation (PSR) valves provide this isolation function. These PSR valves are ASME valves and, therefore, must meet the in-service testing requirements of Section XI of the ASME Boiler and Pressure Vessel Code. The in-service testing and surveillance requirements for the PASS PSR primary containment isolation valves are satisfied by performance of Plant Surveillance Procedure PPM 7.4.0.5.51, "PSR Valve Operability and PASS Operability." On January 10, 1986, the "PSR Valve Operability and PASS Operability" surveillance was completed. It was scheduled to be completed again on March 23, 1986 by the Plant Scheduled Maintenance System (SMS - a computerized tracking system). On March 31, 1986, the SMS computer card (a notification of surveillance due) was turned in with the note that the surveillance was not required due to the Plant being in Operational Mode 4 "Cold Shutdown." ASME Section IWB-3416 does not require in-service testing for valves in systems not required to be operable; however, this section does require testing prior to declaring the valve operable. Technical Specification 3.6.3 requires the PSR primary containment isolation valves to be operable when the Plant is in Operational Modes 1, 2 and 3. Therefore, on June 4, 1986, when the Plant Operational Mode was changed from Mode 4, "Cold Shutdown," to Mode 2, "Startup," the Plant was in violation of both Technical Specification Sections 4.0.5 and 3.6.3 until the surveillance was completed on July 12, 1986.

A second incident occurred under the same circumstances in the Spring and Summer of 1987. In this case, the surveillance was completed on April 7, 1987, skipped on July 7, 1987 due to being in Operational Mode 4, and completed on August 10, 1987. Again, both Technical Specification Sections 4.0.5 and 3.6.3 were violated between August 1, 1987 when the allowable surveillance interval was exceeded and August 10, 1987 when the surveillance was performed.



## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/89.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
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Washington Nuclear Plant - Unit 2	0 5 1 0 0 0 3 9 1 7	8 7	- 0 3 3	- 0 0	0 3	OF	0 4

TEXT (If more space is required, use additional NRC Form 368A's) (17)

The root cause of this event is personnel error in that Plant Chemistry personnel assumed responsibility for the "PSR Valve Operability" surveillance without adequately understanding the surveillance requirements. Responsibility for performing the PSR Valve Operability surveillance was transferred from the Plant Operations Department to the Chemistry Section of the Plant Health Physics and Chemistry Department in April 1984. The transfer of responsibility was made because Chemistry personnel normally operated the PASS and the "PASS Operability" surveillance could be performed in conjunction with the "PSR Valve Operability" surveillance. This is the only ASME valve in-service test performed by the Chemistry Section. The SMS card showed the surveillance was required in Operational Modes 1, 2, or 3. Chemistry personnel did not understand the required Operational Modes on the SMS card signify when "PSR Valve Operability" surveillance requirements are applicable and not when the surveillance can be performed. Further, they did not understand that the surveillance had to be performed either within the allowable surveillance interval or prior to changing from Operational Modes 4 or 5 to Modes 1, 2 or 3. Because of this lack of understanding of the surveillance requirements, Plant procedure revisions which were instituted as a result of a similar event, described in LER 86-32, were not implemented. If they had been, the PSR Valve Operability would have been identified and tracked as requiring completion before the Plant Operational Mode could be changed. Plant procedures were not the cause of this event.

Immediate Corrective Action

None, since the Plant was in Technical Specification compliance at the time of the discovery.

Further Evaluation and Corrective Action

- o The other portion of the surveillance procedure "PASS Operability" is mandated by Plant Technical Specification Administrative Section 6.8.4.C and is described in the WNP-2 Final Safety Analysis Report Table 6.2-16. Requirements for this surveillance have been met.
- o Applicable Chemistry Department personnel will be trained on the requirements of Technical Specification Sections 4.0.5 and 3.6.3.
- o The surveillance procedure will be revised to include applicable Operational Mode information.
- o Plant Health Physics and Chemistry Department personnel will be re-instructed on Plant Procedure 1.5.1, "Technical Specification Surveillance Testing Program."

Safety Significance

There is no safety significance associated with this event because subsequent surveillances proved that the valves were operable during the two time periods when the surveillances were not performed within the Technical Specification time limits.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

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

Further, each PASS sample line has an inboard and outboard primary containment isolation valve so a single failure would not affect the Plant's system isolation capability. In case of an accident, the PASS serves as a backup to on-line Plant instrumentation in determining the extent of core damage. Also, the PASS is designed with redundant sample points so a single failure would not affect the plant's capability to obtain PASS samples. This event posed no threat to the safety of either the public or Plant personnel.

Similar Events

LER 86-32

EIIS InformationText Reference

Post-Accident Sampling System (PASS)  
Process Sample Radiation (PSR) Valves

EIIS Reference  
System      Component

BN      ---  
BN      63

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

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Docket No. 50-397

January 15, 1988

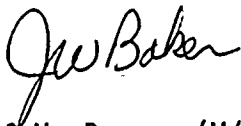
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Washington, D.C. 20555

Subject: NUCLEAR PLANT NO. 2  
LICENSEE EVENT REPORT NO. 87-033

Dear Sir:

Transmitted herewith is Licensee Event Report No. 87-033 for the WNP-2 Plant. This report is submitted in response to the report requirements of 10CFR50.73 and discusses the items of reportability, corrective action taken, and action taken to preclude recurrence.

Very truly yours,



C.M. Powers (M/D 927M)  
WNP-2 Plant Manager

CMP:sm

Enclosure:  
Licensee Event Report No. 87-033

cc: Mr. John B. Martin, NRC - Region V  
Mr. C.J. Bosted, NRC Site (M/D 901A)  
INPO Records Center - Atlanta, GA  
Ms. Dottie Sherman, ANI  
Mr. D.L. Williams, BPA (M/D 399)

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