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SUBJECT: LER 89-008-00:on 881202,missed HPCS diesel generator Tech
 Spec surveillance due to program defecencies.

W/8 ltr.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

Docket No. 50-397

May 19, 1989

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

Subject: NUCLEAR PLANT NO. 2
LICENSEE EVENT REPORT NO. 89-008

Dear Sir:

Transmitted herewith is Licensee Event Report No. 88-008 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.

This LER is also submitted in response to NRC Notice of Violation (NOV) 89-04-03. Corrective actions for failure to submit an LER within the required time frame are contained in our response to the NOV and, as such, this LER describes the event as it occurred and those actions to prevent recurrence.

Very truly yours,

C.M. Powers

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

CMP:lg

Enclosure:

Licensee Event Report No. 89-008

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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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Washington Nuclear Plant - Unit 2										DOCKET NUMBER (2) 0 5 0 0 0 3 1 9 7										PAGE (3) 1 OF 0 5																													
TITLE (4) Missed High Pressure Core Spray (HPCS) Diesel Generator Technical Specification Surveillance Due to Programmatic/Procedural Deficiencies																																																	
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)												
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OPERATING MODE (9) 4										THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																																							
POWER LEVEL (10) 0 1 0 1 0										20.402(b)										20.405(c)										50.73(a)(2)(iv)										73.71(b)									
										20.405(a)(1)(i)										50.38(c)(1)										50.73(a)(2)(v)										73.71(c)									
										20.405(a)(1)(ii)										50.38(c)(2)										50.73(a)(2)(vi)										OTHER (Specify in Abstract below and in Text, NRC Form 366A)									
										20.405(a)(1)(iii)										50.73(a)(2)(i)										50.73(a)(2)(viii)(A)																			
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20.405(a)(1)(v)										50.73(a)(2)(iii)										50.73(a)(2)(x)																													
LICENSEE CONTACT FOR THIS LER (12)																																																	
NAME J.D Arbuckle, Compliance Engineer																				TELEPHONE NUMBER 510 19 317 17 1-12 111 15																													
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																																																	
CAUSE			SYSTEM			COMPONENT			MANUFACTURER			REPORTABLE TO NPDOS			CAUSE			SYSTEM			COMPONENT			MANUFACTURER			REPORTABLE TO NPDOS																						
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 fifteen single-space typewritten lines) (16)																																																	
<p>On April 19, 1989 during a Plant Operating Committee (POC) review of the Supply System response to an NRC Notice of Violation (NOV), it was agreed that a violation of the Plant Technical Specifications had occurred and the appropriate actions were not taken. Specifically, on December 2, 1988 a Technical Specification Amendment Request was submitted to the NRC which described a Divison 3 Diesel Generator (DG-3) trip (incomplete starting sequence) bypass verification that had not been performed as required by the Technical Specifications, and an LER was not issued within 30 days after that determination.</p> <p>The amendment request was submitted to make the Technical Specifications match the FSAR description of the design of DG-3 [i.e., DG-3 trips (is not bypassed) on incomplete starting sequence and is bypassed on an ECCS signal instead of concurrent ECCS and loss of voltage signals]. This discrepancy was due to an oversight in the preparation of the Technical Specifications.</p> <p>Further review of this issue also revealed that only one of three contact pairs on the DG-3 Bypass Relay were actually verified to function by the surveillance procedure.</p> <p>The causes of this event are 1) programmatic deficiency - a process had not been established whereby proposed amendments to the Technical Specifications are formally reviewed for compliance (i.e., reportability concerns) with Technical Specification requirements, and 2) procedural inadequacy - the procedure for testing other DG-3 bypass functions did not require testing of all contacts on the bypass relay.</p> <p style="text-align: right;">Jed 11</p>																																																	

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

Abstract (continued)

Corrective actions included 1) submitting a request for waiver of compliance from the Technical Specification surveillance requirements applicable to the DG-3 incomplete start sequence bypass verification until the amendment request was approved, 2) successful testing of the remaining contacts on the DG-3 bypass relay, and 3) revising the applicable surveillance procedure to require testing of all contacts on the relay. Further corrective actions are 1) establishing a process whereby proposed Technical Specification amendments are formally reviewed for Technical Specification compliance, and 2) considering a process to review Technical Specification requirements and associated surveillance procedures for accuracy and consistency.

This event posed no threat to the health and safety of either the public or Plant personnel.

Plant Conditions

- a) Power Level - 0%
- b) Plant Mode - 4 (Cold Shutdown)

Event Description

On April 19, 1989 during a Plant Operating Committee (POC) review of the Supply System response to NRC Notice of Violation 89-04-03, it was agreed that a violation of the Plant Technical Specifications had occurred and the appropriate actions were not taken. Specifically, on December 2, 1988 a letter was submitted to the NRC which described a Division 3 Diesel Generator (DG-3) trip bypass verification that had not been performed as required by the Plant Technical Specifications, and an LER was not issued within 30 days after that determination.

The following is a sequence of events associated with this LER:

- December 2, 1988

A Technical Specification Amendment Request was submitted to the NRC such that surveillance 4.8.1.1.2.e.7 would match the FSAR description of the design of DG-3 [i.e., DG-3 trips (is not bypassed) on incomplete starting sequence and is bypassed on an ECCS signal instead of concurrent ECCS and loss of voltage signals].

It was determined at that time the discrepancy was due to an oversight in the preparation of the Technical Specifications. The FSAR descriptions were issued in Amendments 23 and 31 (February 1982 and June 1983), before issuance of the WNP-2 Operating License. As a result, the FSAR description of the DG-3 design should have been reflected in the Technical Specifications.

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

Discussions of the issue at that time also focused on 1) current Plant configuration, 2) function of the incomplete start sequence feature, and 3) modifying the Technical Specifications to match the design of the system. Supply System personnel did not followup on the issue of noncompliance with the Technical Specifications as written. However, because the incomplete starting sequence trip was not verified to be bypassed when DG-3 was tested per Plant Procedure (PPM) 7.4.8.1.1.2.8, "HPCS Diesel Generator LOCA Test," on April 28, 1987 and May 16, 1988, this situation is considered to be a violation of the Plant Technical Specifications. As a result an LER should have been submitted as required by 10CFR50.73.

February 1988

During a review of the Technical Specification Amendment Request, the NRC resident inspector confirmed that the as-built design of DG-3 was as described in the FSAR, and verified that the control circuitry was not bypassed on an ECCS actuation. The inspector also raised the question of compliance with the Technical Specifications in that PPM 7.4.8.1.1.2.8 did not verify testing the bypassing of the incomplete starting sequence. Accordingly, a request was submitted to the NRC for waiver of compliance from the Technical Specification surveillance requirements applicable to DG-3 incomplete starting sequence bypass verification until the formal changes requested could be granted.

The inspector also was concerned with the manner in which the Supply System was testing other bypass functions associated with DG-3. Verification of those bypass functions was accomplished by pushing a test button on a temperature switch (DCW-TS-4). However, the Supply System interpreted Technical Specification 4.8.1.1.2.e.7 as requiring testing of the bypass function, not that each trip is bypassed. As a result of that interpretation, it was determined that the surveillance program was adequate in that the "bypass function" was verified to be operable. In addition, because the temperature switch is bypassed on an ECCS signal, it was felt that the requirements of the Technical Specifications were satisfied and, as a result, DG-3 was operable. However, there was a question of operability of the temperature switch in that the test button on the switch had not been tested.

Plant Technical personnel performed an additional review of this issue and discovered that DG-3 Bypass Relay HPCS-RLY-E22B/K11 has three contacts, all of which are used to bypass signals. However, only one of the contacts was actually verified to function by the surveillance procedure (PPM 7.4.8.1.1.2.8). Although only one of three contact pairs was actually verified to be operable by surveillance, it was felt that the relay was operable due to its design. The relay is an HFA relay and it would have been highly unlikely that only one set of contacts would operate and the others not.

On March 27, 1989 the NRC issued three NOVS for 1) not testing the bypass function and only testing one of three contact pairs on the bypass relay, 2) not declaring DG-3 inoperable and entering the associated LCO, and 3) failure to submit an LER.

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Immediate Corrective Action

1. On February 1, 1989 a request was submitted to the NRC for waiver of compliance from the Technical Specification surveillance requirements applicable to the DG-3 incomplete start sequence bypass verification until the changes requested above could be granted. On February 2, 1989 the NRC granted the waiver of compliance.
2. On February 2, 1989 a functional test of the test button associated with Temperature Switch DCW-TS-4 was successfully performed.
3. On February 3, 1989 a temporary procedure was successfully completed which verified operation of the remaining contacts on the DG-3 bypass relay.
4. On March 30, 1989 the Supply System received Amendment No. 66 to the Operating License which deleted the requirement to verify bypassing of the DG-3 incomplete start sequence trip.
5. Plant Procedure (PPM) 7.4.8.1.1.2.8, "HPCS Diesel Generator LOCA Test," was revised to require testing of all contacts on the DG-3 bypass relay.

Further Evaluation and Corrective ActionA. Further Evaluation

1. This event is being reported as a "condition prohibited by the Plant Technical Specifications" per the requirements of 10CFR50.73(a)(2)(i)(B).
2. There were no structures, components or systems that were inoperable prior to the start of this event which contributed to the event.
3. A formal root cause analysis was performed and identified the following causes of this event:
 - a) Programmatic Deficiency: A process had not been established whereby proposed amendments to the Technical Specifications are formally reviewed for compliance (i.e., reportability concerns) with Technical Specification requirements.
 - b) Procedural Problem (Less Than Adequate): PPM 7.4.8.1.1.2.8, "HPCS Diesel Generator LOCA Test," did not require testing of all contacts on the DG-3 bypass relay.
4. Submittal of the request for waiver of compliance (and subsequent NRC approval) caused WNP-2 to be in full compliance with Technical Specification requirements.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

B. Further Corrective Action

1. A process will be established whereby proposed amendments to the Technical Specifications are formally reviewed for compliance with the Technical Specifications.
2. A process is currently being considered to review Technical Specification requirements and associated surveillance procedures for accuracy and consistency.

Safety Significance

There is no safety significance associated with this failure to comply with the Technical Specifications as written. The Technical Specification Amendment Request was submitted to revise the Technical Specifications to be consistent with the FSAR description of the design of DG-3. As stated in the amendment request, a 10CFR50.59 review was performed which concluded that it did not involve an unreviewed safety question. The accident analyses previously performed for this equipment are based on the FSAR description and have not changed. The modification to the Technical Specifications merely corrected an inconsistency between the FSAR and Technical Specification description.

In addition, as stated in the waiver of compliance letter, the DG-3 incomplete starting sequence is not considered to be a protective device as defined in Regulatory Guide 1.9 and; therefore, is not required to be bypassed.

Furthermore, successful testing of the remaining contacts on the DG-3 bypass relay demonstrated that those other bypass functions would have performed as designed during the event period.

Accordingly, this event posed no threat to the health and safety of either the public or Plant personnel.

Similar Events

LEERS 88-036-00 and 88-036-01

EIIS InformationText ReferenceEIIS Reference

System	Component
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High Pressure Core Spray (HPCS), Division 3,
Diesel Generator (DG-3)
Emergency Core Cooling System (ECCS)
Temperature Switch DCW-TS-4
DG-3 Bypass Relay HPCS-RLY-E22B/K11

EK	DG
—	—
LB	TS
EK	RLY