

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)

Washington Nuclear Plant - Unit 2

DOCKET NUMBER (2)

0 5 0 0 0 3 9 7

PAGE (3)

1 OF 0 4

TITLE (4)

Inadequate Primary Containment Integrity Verification

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)								
0	9	13	8	9	038	0	0	10	0	6	8	9	0	5	0	0	0	0	0
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																
POWER LEVEL (10)			20.402(b)			20.405(c)			50.73(a)(2)(iv)			73.71(b)							
1			20.405(a)(1)(i)			50.38(c)(1)			50.73(a)(2)(v)			73.71(c)							
1			20.405(a)(1)(ii)			50.38(c)(2)			50.73(a)(2)(vii)			OTHER (Specify in Abstract below and in Text, NRC Form 366A)							
0			20.405(a)(1)(iii)			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)

NAME

C. L. Fies, Compliance Engineer

TELEPHONE NUMBER

AREA CODE

5 0 9 3 7 7 - 2 5 0 1

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

E X T 2 0 3 9

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

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YES (If yes, complete EXPECTED SUBMISSION DATE)

X NO

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

On September 13, 1989, a reportability evaluation was approved by the Plant Technical Manager which directed that an event which began on January 21, 1989, be reported per 10CFR50.73. On the later date, plant equipment operators discovered two small 3/8 inch valves which should have been included on the primary containment integrity verification surveillance. The immediate corrective action placed these valves on the surveillance to allow verification of their closed condition to occur on a monthly frequency. The Plant Manager also directed that the containment integrity procedure be compared with the local leak rate testing procedure to identify any other missing valves. Four additional 1/2 inch valves were discovered during that review.

The root cause of this event was less than adequate procedures that did not identify all the containment items that require verification.

Further corrective action will include a physical walk-down of all containment penetrations to provide assurance that all items are now contained on the checklist.

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

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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	0 5 0 0 0 3 9 7	8 9	— 0 3 8	— 0 0	0 2	OF	0 4

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

Plant Conditions

Power Level - 100%

Plant Mode - 1 (Power Operation)

Event Description

On September 13, 1989, a reportability evaluation was approved by the Plant Technical Manager which directed that an event which began on January 21, 1989, be reported per 10CFR50.73.

On January 21, 1989, while doing the primary containment integrity verification surveillance procedure (7.4.6.1.1), plant equipment operators discovered two 3/8 inch drain line valves (SLC-V-52 and SLC-V-53) associated with a standby liquid control flow transmitter (SLC-FT-1) which were not labeled and not contained on the primary containment integrity valve checklist (see Sketch 1). These valves are used to drain the instrument lines when calibrating SLC-FT-1 which is required on a yearly surveillance. These valves are located inside the outboard isolation valves (SLC-V-4A and SLC-V-4B) and therefore require closed verification on a monthly frequency per Technical Specification surveillance 4.6.1.1.b.

During the review of the problem evaluation request, the Plant Manager directed that the containment integrity verification procedure, PPM 7.4.6.1.1, be compared with the Local Leak Rate Test (LLRT) procedure to check for additional missing valves. This review identified four Containment Monitoring System (CMS) valves which should have been on the primary containment integrity verification surveillance (PI-V-X29b1, PI-V-29f1, PI-V-X30a1, PI-V-X30f1). The purpose of these 1/2 inch valves is to allow operability tests to be performed on the associated excess flow check valves (PI-EFC-X29b, PI-EFC-X29f, PI-EFC-X30a, and PI-EFC-X30f) located directly downstream from the containment (see Sketch 2). These four valves were added to the plant during the refueling outage in May 1986.

Immediate Corrective Action

The primary containment integrity verification procedure was updated to show the additional valves.

Further Evaluation and Corrective ActionA. Further Evaluation

1. This event is being reported as a "...deviation from the plant's Technical Specifications..." per the requirements of 10CFR50.73(a)(2)(i)(C).
2. There were no structures, components or systems that were inoperable prior to the start of this event which contributed to the event.

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Washington Nuclear Plant - Unit 2	0 5 0 0 0 3 9 7	8 9	— 0 3 8	— 0 0	0 3	OF	0 4

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

3. The root cause of this event was less than adequate procedures that did not identify all the containment items that require verification. A contributing cause was inadequate review of procedures impacted by the plant modification which installed the four excess flow check valve test connections and valves.
4. The Plant modification process has been improved to provide a more complete review of impacted plant procedures.

B. Further Corrective Action

A physical walkdown will be performed of all containment penetrations to provide assurance that all items are now contained on the checklist. This walkdown will also identify the items that may have been added by plant modification.

Safety Significance

The establishment of primary containment integrity ensures that the release of radioactive material from the containment will be restricted to those leakage paths and rates assumed in the FSAR. This restriction is relied upon to limit the control room and site boundary radiation doses to within the limits established by General Design Criterion 19 and 10CFR100 during accident conditions.

The two valves associated with SLC-FT-1 (SLC-V-52 and SLC-V-53) are located outside containment and outboard of SLC-V-6, a check valve in the SLC injection line. The inboard containment isolation valve (SLC-V-7) is the inboard isolation valve located inside primary containment. Thus, there are two check valves in a series between the two drain valves and the primary containment. The second check valve (SLC-V-6) is not considered a containment isolation valve, but for purposes of this analysis, it does exist upstream of the valves in question and provides assurance of containment integrity. During plant operations, the lines leading to SLC-V-52 and SLC-V-53 are continually filled with water. Thus, any leaks in these valves would be apparent as they are in a very accessible area of the reactor building. These valves are only used during the 18 month surveillance which is performed during the annual refueling outage. In addition, the lines are capped downstream of the valves.

The four test connections for the excess flow check valves were added by a plant modification in May 1986. These test connections are used to test the excess flow check valve operation on the one inch lines which penetrate primary containment to monitor process conditions inside containment. These taps are used for an 18 month surveillance which is performed during the annual refueling outage. Specific steps in the procedure, Surveillance Testing of Containment Atmosphere and Suppression Pool Level Excess Flow Check Valves (7.4.6.3.4.2), call for the test connection valve to be closed after the test and the cap to be replaced on the line. In addition, the four test connections were identified in the Integrated Leak Rate Test (PPM) 7.4.6.1.2.1) which was performed at the end of the 1987 outage.

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Washington Nuclear Plant - Unit 2	0 5 0 0 0 3 9 7	8 9	— 0 3 8	— 0 0 0	4	OF	0 4

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

In conclusion, there is a very low probability of these valves adversely affecting containment integrity even though they were not on the checklist.

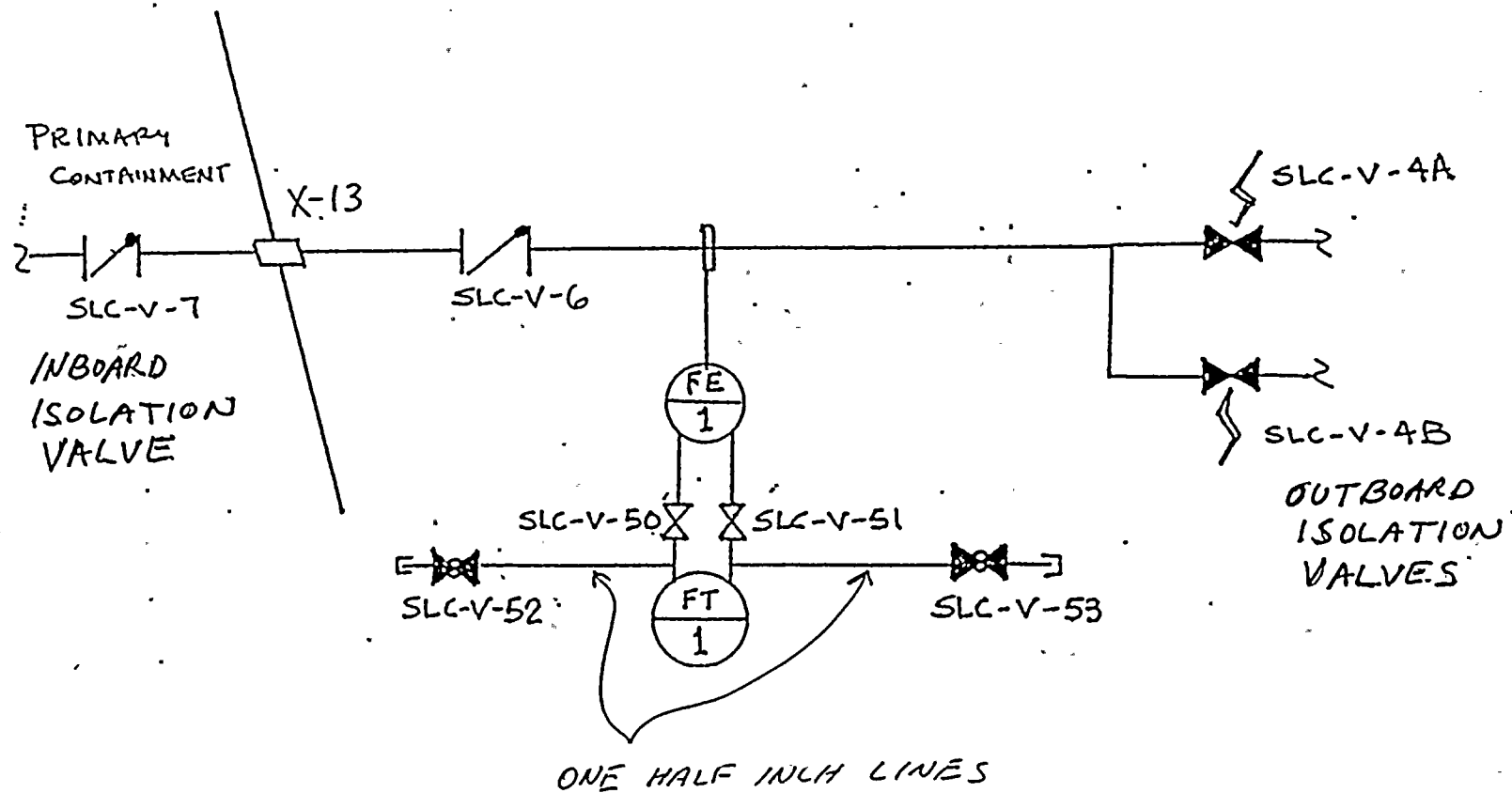
Similar Events

LER 84-130 was written when 25 valves were found not listed on the primary containment integrity verification surveillance.

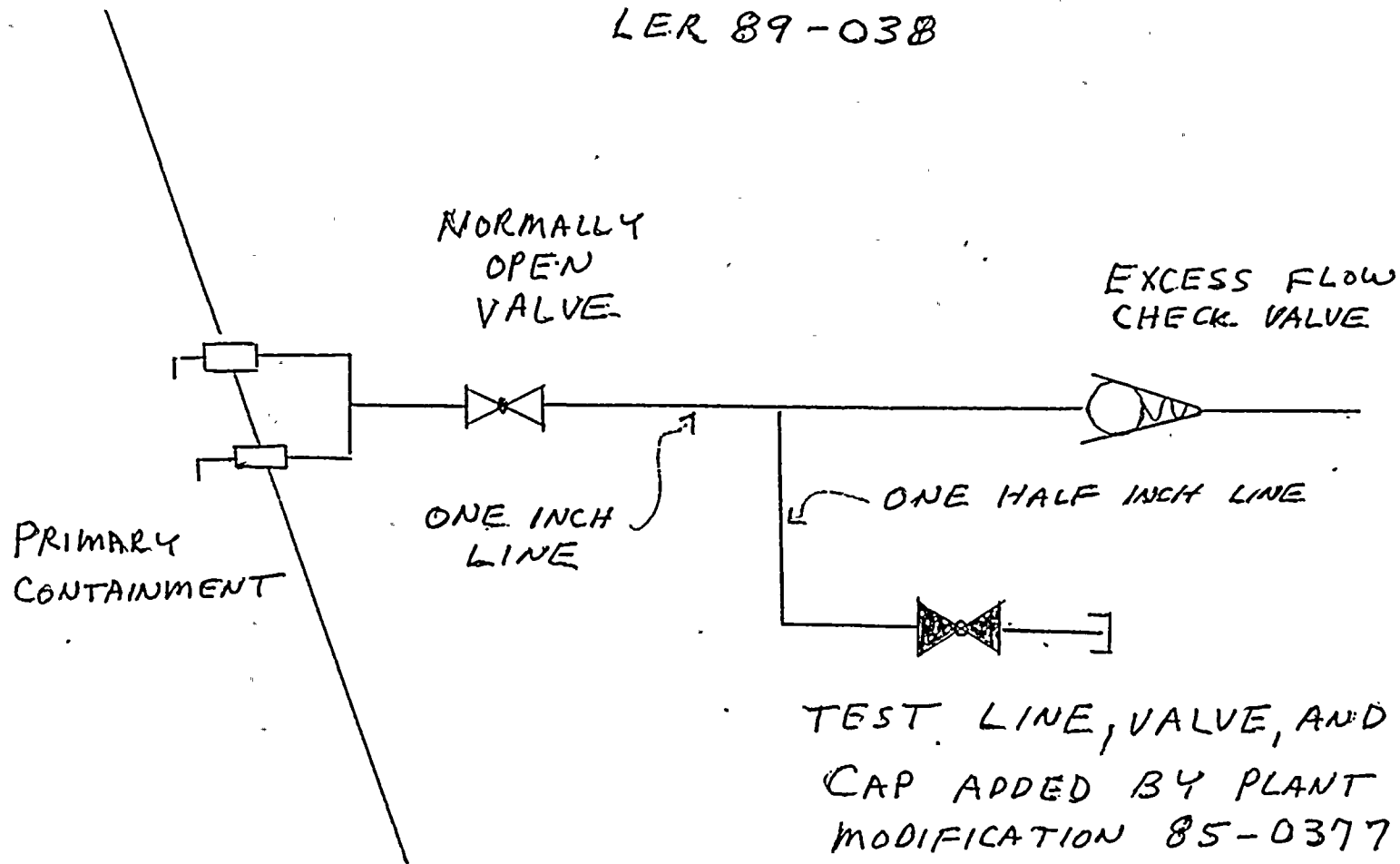
EIIS InformationText ReferenceEIIS Reference

	<u>System</u>	<u>Component</u>
Primary Containment	NH	--
SLC-V-52	BR	V
SLC-V-53	BR	V
SLC-FT-1	BR	FT
Containment Monitoring System (CMS)	IK	--

SKETCH 1
LER 89-038



SKETCH 2
LER 89-038



TYPICAL (ONE OF FOUR)