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SUBJECT: LER 89-045-00:on 891201,test connections not on primary
 containment integrity verification surveillance.
 W/8 ltr.

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 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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	NRR/DLPQ/LHFB11	1 1	NRR/DLPQ/LPEB10	1 1
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90-4

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

December 29, 1989

Docket No. 50-397

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

Subject: NUCLEAR PLANT NO. 2
LICENSEE EVENT REPORT NO. 89-045

Dear Sir:

Transmitted herewith is Licensee Event Report No. 89-045 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:lg

Enclosure:

Licensee Event Report No. 89-045

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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ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

TITLE (4) TEST CONNECTIONS NOT ON PRIMARY CONTAINMENT INTEGRITY VERIFICATION SURVEILLANCE

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)									
1		20.402(b)		20.406(c)		50.73(a)(2)(iv)		73.71(b)			
POWER LEVEL (10)	100	20.406(a)(1)(i)		50.38(c)(1)		50.73(a)(2)(v)		73.71(c)			
		20.406(a)(1)(ii)		50.38(c)(2)		50.73(a)(2)(vii)		OTHER (Specify in Abstract below and in Text, NRC Form 366A)			
		20.406(a)(1)(iii)	X	50.73(a)(2)(ii)		50.73(a)(2)(viii)(A)					
		20.406(a)(1)(iv)		50.73(a)(2)(iii)		50.73(a)(2)(viii)(B)					
		20.406(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(ix)					

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										F Y T 2 0 3 9	
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	

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

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

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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 4 5	-	0 0	0 2	OF	0 4

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

Plant Conditions

- a) Power Level - 100%
- b) Plant Mode - 1

Event Description

On December 1, 1989 the Plant System Engineer was reviewing and closing out the work package associated with a Plant Modification that was performed during the Spring 1989 refueling outage. This plant modification installed a test connection including two valves in series (RRC-V-915 and RRC-V-916) followed by a threaded pipe cap (see attached sketch) to simplify leak rate testing of containment isolation valves RRC-V-19 and RRC-V-20. Since these test connection valves are between the containment and the outboard containment isolation valve, RRC-V-20, Technical Specification surveillance 4.6.1.1.b requires they be verified in the closed position on a monthly frequency. Contrary to this requirement, these valves were not added to the primary containment integrity verification surveillance procedure (7.4.6.1.1) and were consequently not being verified in the closed position since their installation and placement into service on June 1, 1989.

Immediate Corrective Action

Both valves were verified closed and both valves were added to the primary containment integrity verification procedure (7.4.6.1.1).

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)(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. The root cause of this event was personnel related as the Plant Modification Procedure (PPM 1.4.1) was not being followed by the Project Engineer responsible for the Plant Modification. The test valves were installed with a Field Change Request which requires the Project Engineer to check if plant procedures are affected. In this case the "no" box was checked contrary to the content of the field change.
4. The two valves were verified closed as part of the test program associated with the outage. Specifically, Plant Procedure PPM 7.4.6.1.2.4, Containment Isolation Valve and Penetration Leak Test Program, restored the valves to the closed position on June 7, 1989.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (8)

PAGE (3)

YEAR	SEQUENTIAL NUMBER	REVISION NUMBER
89	045	00

Washington Nuclear Plant - Unit 2

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

B. Further Corrective Action

1. Further corrective action included counseling the Project Engineer in the use of the Field Change Request (FCR) emphasizing the fact that the FCR must be given equal review in reference to effected documents.
2. All work packages involved with this plant modification were reviewed and corrective actions taken to update other documentation.
3. This LER will be distributed for review by all project engineers with a cover memo from the Plant Technical Manager emphasizing the importance of reviewing and identifying any documents, including plant procedures, that could be impacted by a field change request.
4. A physical walkdown will be performed of all containment penetrations to provide assurance that all items are now contained on the monthly surveillance. This corrective action was identified in LER 89-038 (see Similiar Events below) and will now be expedited by completing the walkdown of accessible penetrations prior to March 1, 1990. The remaining penetrations will be reviewed during the Spring 1990 refueling outage.

Safety Significance

During normal plant operation RRC-V-19 and RRC-V-20 are open providing a process sample flow of primary water to sample point number one (SP-1). Any leakage through the test connection valves, RRC-V-915 and RRC-V-916 or the threaded end cap would be very apparent as these valves are located in the Reactor Building (Elevation 501 feet, Azimuth 320 degrees) in an area frequented by plant personnel. The valves were never found in an open position and no leakage was ever observed from the valves or the threaded end cap. Consequently, there is no safety significance associated with this event.

Similiar Events

LER 84-130 as written when valves were found not listed on the primary containment integrity verification surveillance shortly after plant startup. More recently LER 89-038 was written when additional valves were found. The corrective action for LER 89-038 is not yet complete but will now be expedited to provide assurance that all valves are included on the monthly surveillance.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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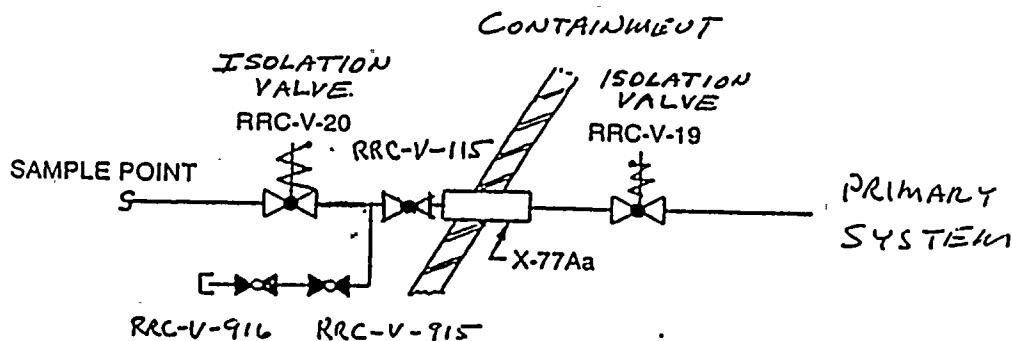
TEXT (If more space is required, use additional NRC Form 366A's) (17)

EIIS InformationText Reference

Primary Containment
Sampling System
RRC-V-915
RRC-V-916
RRC-V-19
RRC-V-20

EIIS Reference

System	Component
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KN	---
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