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RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 90-022-00:on 900930,ESF acuation of containment
instrument air caused by depleting nitrogen cryogenic tank.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

Docket No. 50-397

October 26, 1990

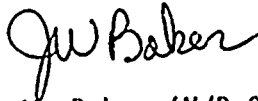
Document Control Desk
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Washington, D.C. 20555

Subject: NUCLEAR PLANT NO. 2
LICENSEE EVENT REPORT NO. 90-022

Dear Sir:

Transmitted herewith is Licensee Event Report No. 90-022 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,



J. W. Baker (M/D 927M)
WNP-2 Plant Manager

JWB:lr

Enclosure:
Licensee Event Report No. 90-022

cc: Mr. John B. Martin, NRC - Region V
Mr. C. Sorensen, NRC Resident Inspector (M/D 901A)
INPO Records Center - Atlanta, GA
Ms. Dottie Sherman, ANI
Mr. D. L. Williams, BPA (M/D 399)
NRC Resident Inspector - walk over copy



LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 600 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) Washington Nuclear Plant - Unit 2										DOCKET NUMBER (2) 0 5 0 0 0 3 9 7 1				PAGE (3) OF 0 7								
TITLE (4) Engineered Safety Feature Actuation of Containment Instrument Air (CIA) Caused by Depleting the Nitrogen Cryogenic Tank																						
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	30	90	09	0	0	2	2	0	0	1	0	2	6	9	0	0	5	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)				<input checked="" type="checkbox"/> 60.73(a)(2)(iv)				73.71(b)								
0		20.405(a)(1)(i)				60.38(c)(1)				60.73(a)(2)(v)				73.71(c)								
7		20.405(a)(1)(ii)				60.38(c)(2)				60.73(a)(2)(vii)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)								
0		20.405(a)(1)(iii)				60.73(a)(2)(i)				60.73(a)(2)(viii)(A)												
		20.405(a)(1)(iv)				60.73(a)(2)(ii)				60.73(a)(2)(viii)(B)												
		20.405(a)(1)(v)				60.73(a)(2)(iii)				60.73(a)(2)(ix)												
LICENSEE CONTACT FOR THIS LER (12)																						
NAME C. L. Fies, Compliance Engineer										TELEPHONE NUMBER 5101 9 3171 71 - 1 2 51011												
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)												<input checked="" type="checkbox"/> NO										

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

At 1600 hours on September 30, 1990, while plant operators were inerting the primary containment during a reactor startup, a pressure decrease occurred in the Containment Instrument Air (CIA) System. The pressure loss occurred when Nitrogen Cryogenic Tank CN-TK-1 (the normal supply used for containment inerting and for CIA) was inadvertently depleted of liquid nitrogen. This pressure decrease caused the safety related part of the CIA system to be isolated and automatically placed the backup bottled nitrogen source into service. This action is considered an Engineered Safety Feature Actuation. Further evaluation showed that the pressure maintained by the bottled nitrogen source in Division II did not meet design requirements because of a misadjusted pressure regulator.

The root cause of this event was less than adequate procedures that did not contain adequate precautions for containment inerting with low tank levels. This allowed the level in the tank to drop to the point where there was a loss of pressure in the CIA system. The root cause of the low nitrogen pressure in Division II was procedures not being followed by Plant Operators with a contributing cause being lack of clarity in these same procedures.



LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

Abstract (contd.)

Immediate corrective action was taken to obtain an additional supply of liquid nitrogen. Procedures were also changed to make sure plant operators are aware of CN-TK-1 level and the possibility of loss of pressure due to low tank level. Corrective action was also taken to adjust the pressure regulator.

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

Plant Conditions

Power Level - 70%

Plant Mode - 1

Event Description

At 1600 hours on September 30, 1990, while plant operators were completing the inerting of the primary containment, a pressure decrease occurred in the Containment Nitrogen Inerting System (CN) and the Containment Instrument Air (CIA) System. The pressure loss occurred when the Nitrogen Cryogenic Tank (CN-TK-1) was inadvertently depleted of liquid nitrogen.

The Containment Nitrogen Inerting System (CN) is a non-safety related system that provides a one million standard cubic foot supply of nitrogen for the plant. It provides a high volume source of nitrogen to inert the containment and also provides a regulated supply of nitrogen to specific loads inside Containment. One of these loads is the Containment Instrument Air (CIA) header which supplies pneumatic pressure to the Inboard Main Steam Isolation Valves (MSIVs) and the Main Steam Safety/Relief Valves (SRVs).

The safety-related part of the CIA provides the nitrogen supply to operate the Main Steam Safety Relief Valves (MSRVs) in the Automatic Depressurization System (ADS) mode of operation. The ADS is a portion of the backup Emergency Core Cooling System (ECCS) designed to quickly reduce reactor pressure in the unlikely event of failure of the High Pressure Core Spray (HPCS) system. The ADS is composed of seven specially designated MSRVs that provide rapid depressurization of the primary system. The safety-related part of the CIA system normally receives nitrogen from the non-safety-related part of the system via CIA-V-39A(B). The "A" devices are used to designate safety-related Division I and the "B" devices make up Division II. When a loss of pressure is detected by Pressure Switches CIA-PS-39A(B) valves CIA-V-39A(B) are automatically closed. The isolation of these valves occurred at 1618 hours when the pressure dropped to 137 psig as required by system design.



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

When the CN system loses pressure plant operators must take manual action to provide a backup supply of air from the Control Air (CAS) and Service Air (SA) Systems to prevent the MSIVs from closing. At 1625 hours Plant Operators cross connected the CAS system to the CIA system per plant procedures. However, while in this condition no CAS air flow was seen as the CIA pressure decayed to 101 psig. Plant operators then installed an air jumper between the Service Air (SA) System and the CIA receiver tank (CIA-AR-1) through CIA-V-19. At 1910 hours CIA non-safety-related header pressure was stabilized at approximately 105 psig. A truckload of liquid nitrogen had previously been ordered and was scheduled for delivery on October 1, 1990. It arrived on schedule and at 1125 hours plant operators began filling CN-TK-1. The CN system was placed back into service at approximately 1600 hours on October 1, 1990.

Following isolation the CIA system is designed to maintain the Division I and II safety-related headers at a nominal pressure of 150 psig using backup nitrogen bottles. A total of three signals are used to initiate backup nitrogen for the ADS. The signals are (1) CIA-PS-22A(B) 137 PSIG, (2) CIA-PS-21A(B) 140 PSIG, and (3) CIA-V-39A(B) closed as previously discussed. These signals feed a two-out-of-three logic circuit which initiates the stepping programmers for the nitrogen bottles. Programmer "A", CIA-PROG-1A, is initiated by the "A" logic and provides backup nitrogen to three ADS valves. Programmer "B", CIA-PROG-1B, is initiated by the "B" logic and provides backup nitrogen to four additional ADS valves. At 1620 hours CIA-PROG-1B (Division II) was automatically initiated by the logic described above. The pressure in the Division II header dropped to a low of 117 psig at 1900 hours and then stabilized at 120 psig. It remained at 120 psig until approximately 1600 hours on October 1, 1990 when the normal CN system was placed back into service as described above. It should be noted that the accumulators for the ADS valves each have a check valve between the accumulator and the header where the relief valve is located. Thus, nitrogen pressure was available to operate the Division II ADS valves. The pressure in the Division I part of the CIA system was maintained at approximately 150 psig throughout this time period.

The CN system was placed back into service at 1600 hours on October 1, 1990 and the CIA main header pressure returned to approximately 150 psig.

Immediate Corrective Action

1. Immediate action was taken to obtain additional liquid nitrogen.
2. The Containment Nitrogen Inerting Procedures (PPM 2.3.1 and 2.3.7) were revised to provide a lower limit for CN-TK-1 level.

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Further Evaluation and Corrective ActionA. Further Evaluation

1. The actuation of the Division II portion is being reported in accordance with the requirements of 10CFR50.73(a)(2)(iv) as an "event or condition that resulted in manual or automatic actuation of any Engineered Safety Feature (ESF).....".
2. An engineering evaluation of the CIA data on October 12, 1990 showed that pressure maintained in the Division II CIA header from 1620 hours on September 30 to 1600 hours on October 1 was below the design basis value. Engineering Calculation 5.46.05 states a pressure of 127 psig is required to satisfy the system safety function. This value is based on a Safety Relief Valve (SRV) actuating pressure of 88 psid and a peak containment pressure of 39 psig.
3. Further evaluation on October 12 indicated that the pressure regulator for Division II (CIA-PCV-2B) was probably not adjusted properly which would have caused the low pressure in the header observed on September 30 and October 1, 1990. At 1000 hours on October 12, 1990 ADS Division II was declared inoperative due to potential low header pressure (if the ADS System were actuated) and Technical Specification Action Statement 3.5.1.e.2 was entered which requires HOT SHUTDOWN within the next twelve hours. An emergency work request was generated to investigate the pressure setpoint of CIA-PCV-2B. During troubleshooting it was immediately apparent that CIA-PCV-2B was not set at the proper pressure and an adjustment was completed to establish a pressure of 150 psig in the Division II header. ADS Division II was then declared operable at 1242 hours on October 12, 1990.
4. There are two root causes associated with this event:
 - a. The part of the event associated with the loss of nitrogen supply was caused by less than adequate procedures that did not alert the operator to stop the inerting in time to prevent a decrease in pressure.
 - b. The portion of the event related to operation with low Division II header pressure was caused by plant operating personnel not following procedures. A contributing cause was the fact the procedures did not clearly define actions to be taken when header pressure dropped to 120 psig. When the Division II header pressure dropped to 137 psig at 1618 hours on September 30, 1990, Pressure Switch CIA-PS-22B caused the "N2 DIV 2 SUPPLY PRESS LOW" Bypassed and Inoperable Status

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

Indication (BISI) alarm to annunciate in the control room. This alarm provides input to alarm window 10-4, on Panel 820.B1 which reads "CIA DIV 2 OUT OF SERVICE". A plant abnormal condition procedure (PPM 4.820.B1, Window 10-4) states a number of actions that are to be taken in response to this alarm. They include a "Check for proper control of CIA-PCV-2B" and to "Consider bypassing if necessary." The procedure recommends monitoring pressure on other instruments that are available: namely, CIA-PI-21B and CIA-PI-31B. Finally, the procedure states that, "IF ADS header pressure (CIA-PS-21B) decays to 135 PSIG, ADS capability is impaired; REFER to Technical Specification 3.5.1."

5. There were no structures, components or systems that were inoperable prior to the start of the first part of this event associated with the loss of the contents of CN-TK-1. The loss of this tank clearly contributed to the second part of the event associated with low pressure in the Division II CIA header.

B. Further Corrective Action

1. An Instrument Setpoint Change Request is being prepared to move the low level alarm on CN-TK-1 from 220 inches to 80 inches.
2. Procedures for using CAS as a backup to CIA will be evaluated to see if changes need to be made to better define when and how the backup is to be accomplished.
3. Plant operating personnel were counseled on the need to strictly follow the guidance provided in Abnormal Condition Procedures.
4. Plant Procedure (PPM 4.820.B1-10-4) will be modified to assure actions required in response to low nitrogen supply pressure are clear.
5. A review of surveillance procedures will be conducted to provide additional assurance that regulating valves on the safety-related part of CIA (CIA-PCV-2A and 2B) are set correctly to maintain pressure. This will also include a review of methods for assuring the valve has not been moved.

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Safety Significance

There is no safety significance associated with this event. The accumulators for the ADS valves each have a check valve between the accumulator and the header where the relief valve is located. Thus, nitrogen pressure would have been available for initial automatic operation of the ADS valves.

The safety-related nitrogen supply for the ADS valves is designed to maintain the ADS function for 100 days following a postulated LOCA. The Programmers along with 34 nitrogen cylinders provide a 30-day supply of nitrogen. In addition, each division has a single remote nitrogen cylinder CIA-TK-20A(B) that provides nitrogen for the time period from 30 to 100 days. All these nitrogen sources feed through the pressure regulators (CIA-PCV- 2A(B) that control pressure to 150 psig. The pressure regulators are located in the corridor between the Diesel Generator and the Reactor buildings. This is one of the areas of the plant that is designed to be accessible during LOCA conditions. Thus, Plant Operators would have had access to CIA-PCV-2B and could have adjusted the pressure in the unlikely event it was needed during long-term post-LOCA conditions. In addition, the CIA-PCV-2B has a bypass valve and a local pressure indicator (CIA-PI-31B) that could be used to control pressure. Accordingly, there was no threat to the health and safety of either plant personnel or to the public.

Similar Events

There were two recent LERs associated with loss of normal CIA pressure and ESF actuation of the safety-related portion of CIA. LER 90-005 describes the event that occurred when the normal CIA supply was lost due to a faulty non-safety-related circuit breaker. LER 90-018 describes the event that occurred on September 4, 1990 when a light fixture was inadvertently moved against the manual handle on relief valve CIA-RV-5B causing depressurization of the Division II portion of the system. These events did occur on the CIA system but are not related.

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

EIIS InformationText ReferenceEIIS ReferenceSystem Component

Containment Instrument Air (CIA)	LD	--
Nitrogen Cryogenic Tank (CN-TK-1)	LK	TK
Containment Nitrogen Inerting System (CN)	LK	--
Main Steam Isolation Valves (MSIVs)	SB	V
Safety Relief Valves (SRVs)	SB	V
Automatic Depressurization System (ADS)	BG	--
High Pressure Core Spray System (HPCS)	BG	--
CIA Valves 39A and B (CIA-V-39A(B))	LD	V
CIA Pressure Switches 39A and 39B (CIA-PS-39A(B))	LD	PS
Control Air System (CAS)	LD	--
Service Air System (SA)	LF	--
CIA Receiver Tank (CIA-AR-1)	LD	TK
CIA Valve 19 (CIA-V-19)	LD	V
CIA Pressure Switches 22A and 22B (CIA-PS-22A(B))	LD	PS
CIA Pressure Switches 21A and 21B (CIA-PS-21A(B))	LD	PS
CIA Programmers 1A and 1B (CIA-PROG-1A(1B))	LD	PMC
CIA Pressure Control Valve 2B (CIA-PCV-2B)	LD	PCV
CIA Pressure Indicator 21B (CIA-PI-21B))	LD	PI
CIA Pressure Indicator 31B (CIA-PI-31B))	LD	PI
CIA Remote Nitrogen Cylinder 20A and 20B (CIA-TK-20A(B))	LD	TK

