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ACCESSION NBR: 9111060116 DOC. DATE: 91/10/30 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
 AUTH. NAME AUTHOR AFFILIATION
 SWANK, D.A. Washington Public Power Supply System
 BAKER, J.W. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 91-028-00: on on 910930, containment airlock door seal leakage test not performed within allowable surveillance interval. Caused by inadequate personnel work practices. Master startup checklist amended. W/911030 ltr.

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

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

October 30, 1991
G02-91-199

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. 91-028

Dear Sir:

Transmitted herewith is Licensee Event Report No. 91-028 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
WNP-2 Plant Manager

Enclosure:
Licensee Event Report No. 91-028

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

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LICENSEE EVENT REPORT (LER)

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)

Washington Nuclear Plant - Unit 2

DOCKET NUMBER (2)

0 5 0 0 0 3 8 17

PAGE (3)

1 OF 0 4

TITLE (4)

Containment Airlock Seal Test Not Performed in Allowable Time Period

| 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 | 3 | 0 | 9 | 1 | 9 | 1 | 1 | | | 0 5 0 0 0 |
| 0 | 9 | 3 | 0 | 9 | 1 | 9 | 1 | 1 | | | 0 5 0 0 0 |
| OPERATING MODE (9) | | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 8: (Check one or more of the following) (11) | | | | | | | | | |
| POWER LEVEL (10) | | 20.402(b) | | | | | | | | | |
| 0 1 1 2 | | 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(c) | | | | | | | | | |
| | | 50.73(a)(2)(iv) | | | | | | | | | |
| | | 50.73(a)(2)(v) | | | | | | | | | |
| | | 50.73(a)(2)(vi) | | | | | | | | | |
| | | 50.73(a)(2)(vii)(A) | | | | | | | | | |
| | | 50.73(a)(2)(vii)(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

D. A. Swank, Compliance Engineer

TELEPHONE NUMBER

AREA CODE

510 19 317 171-1 4114 17

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

| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NRC | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NRC |
|-------|--------|-----------|--------------|-------------------|-------|--------|-----------|--------------|-------------------|
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SUPPLEMENTAL REPORT EXPECTED (14)

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

☐ YES (If yes, complete EXPECTED SUBMISSION DATE)☒ NO

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

On September 30, 1991 at 1036 hours the containment airlock door seal leakage test required by Technical Specification 3/4.6.1.3 was not performed within the allowable surveillance interval. This is a deviation from the plant's Technical Specifications and is reportable in accordance with the requirements of 10 CFR 50.73(a)(2)(i)(B).

WNP-2 entered Mode 2 from Mode 4 at 1636 hours on September 26, 1991. From that time the plant had 72 hours (plus 25% or 18 hours) to complete the required airlock seal test. The test was completed approximately four hours after expiration of the Technical Specification allowed surveillance interval, but within the 24 hour period provided in Action Statement 3.6.1.3.c.

The root cause of this event is personnel work practices less than adequate in that an intended or required verification was not performed. A procedurally required verification that the airlock seal test be performed in the allotted time period was not satisfied.

Corrective actions include: 1) Immediate performance of the required testing within the Action Statement time requirements; 2) Deviations to plant startup procedures to include specific guidance and requirements to ensure the test is performed prior to entry into the applicable Operational Condition; and 3) This LER will be required reading for Operations personnel.

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 (6) | | | PAGE (3) | |
|-----------------------------------|-------------------|----------------|-------------------|-----------------|----------|----|
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | |
| Washington Nuclear Plant - Unit 2 | 0500039791 | 91 | 028 | 0 | 02 | 04 |

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

Plant Conditions

Plant Mode - 1 (RUN)
Power Level -12%

Event Description

At approximately 1030 hours on September 30, 1991 plant personnel discovered that the primary containment airlock door seal leak rate test had not been performed within the allowable surveillance interval. WNP-2 was starting up from Cold Shutdown (Mode 4) conditions after an extended outage. The actual startup began on September 26, 1991 at 1636 hours when the Mode Switch was placed in the Startup/Hot Standby position and control rods were withdrawn.

Technical Specification 4.6.1.3.b requires that the airlock door seals be tested "within 72 hours following each closing, except when the airlock is being used for multiple entries, then at least once per 72 hours..." and is applicable in Modes 1, 2 and 3. Since the plant was taken from Mode 4 directly to Mode 2 during this startup as normal for a startup from refueling, the 72 hour interval commenced when Mode 2 was entered. The allowable 72 hours expired at 1636 hours on September 29, 1991. However, Technical Specification 4.0.2 provides flexibility for surveillance scheduling by permitting "a maximum allowable extension not to exceed 25% of the specified surveillance interval." In this case, the 25% provided an additional 18 hours for performance of the test. The additional 18 hours expired at 1036 on September 30, 1991. Although the test was begun at 0817 hours on September 30, 1991, it was not completed until 1455 hours, a deviation from the Technical Specification requirements.

Immediate Corrective Action

The airlock door seal surveillance was successfully completed at 1455 hours on September 30, 1991, restoring the airlock to fully operable status.

Further Evaluation and Corrective ActionA. Further Evaluation

1. The bases for the WNP-2 Technical Specifications states "failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specifications." This LER is submitted pursuant thereto.
2. There were no structures, systems or components inoperable prior to the event which contributed to the event.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 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) | |
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

3. On expiration of the allowed surveillance time interval (plus 25%) the airlock was technically inoperable. Upon determining that the airlock door seal leak test had not been performed, the Shift Manager logged entry into the Action Statement for the airlock Technical Specification (3/4.6.1.3) at 1045 hours on September 30, 1991. Airlock operability was restored within the action statement 24 hour time limit and no further immediate action was necessary.
 4. The apparent cause of this event is personnel work practices were less than adequate in that an intended or required verification was not performed. The Master Startup Checklist procedure (PPM 3.1.1) specifies that the procedure performer verify that the airlock door seals be tested "within 72 hours following closing [of the airlock door] for establishing primary containment." This procedure step was signed off with the understanding that the seals would be tested following the completion of required containment entries for inspections, and prior to the expiration of the 72 hour allowable time period. Normal administrative methods of tracking required actions for Technical Specification Limiting Condition For Operation or inoperable equipment were not utilized. This resulted in the seal test not being completed within the allowable time period.
- B. Further Corrective Action
1. The Master Startup Checklist, PPM 3.1.1, has been amended to require performance of the airlock door seal tests prior to entry into Mode 2. Previously, the procedure required only a verification that the "Door seals tested within 72 hours following closing..." This change forces performance of the surveillance prior to entry into Mode 2, or logging the equipment as inoperable.
 2. Precautions and signoff steps have been added to PPMs 3.1.1, 3.1.2 (Reactor Plant Cold Startup), and 3.1.4 (Minimum Startup Checklist) to reflect the surveillance requirements following closure of the airlock.
 3. This LER will be required reading for Operations personnel.

Safety Significance

This event had no safety significance. Performance of the required airlock door seal leakage test verified that the seals were intact and met the required leakage acceptance criteria. In addition, the test of the entire airlock for leakage, as required by Technical Specification 4.6.1.3.c, was up-to-date. This test provides additional assurance that the airlock was capable of performing its intended safety function.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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| Washington Nuclear Plant - Unit 2 | 0 5 0 0 0 3 9 7 9 1 | — | 0 2 8 | — | 0 0 0 4 | OF | 0 4 |

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Similar Events

LER 87-031 documented one instance of a Technical Specification deviation due to personnel failure to follow established procedural requirements. In that instance, plant personnel failed to recognize that a surveillance requirement was not met during the performance of a surveillance test and failed to notify the Operations Shift Manager of this condition as required by the procedure.

EIIS InformationText Reference

Containment Airlock

EIIS ReferenceSystem

NH

Component

AL