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 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 91-036-01: on 911226, a missed ASME Section XI Inservice Test for FPC relief valve was determined to violate TS 4.0.2 requirements. Caused by managerial methods were insufficient. Performing required ASME surveillance testing. W/920212 ltr.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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February 12, 1992

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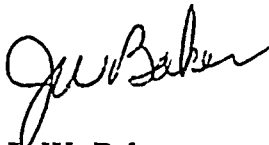
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Washington, D. C. 20555

**Subject: NUCLEAR PLANT WNP-2, OPERATING LICENSE NPF-21
LICENSEE EVENT REPORT NO. 91-036-01**

Transmitted herewith is Licensee Event Report No. 91-036-01 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.

Sincerely,



J. W. Baker
WNP-2 Plant Manager (Mail Drop 927M)

Enclosure

cc: Mr. John B. Martin, NRC - Region V
Mr. C. Sorensen, NRC Resident Inspector (Mail Drop 901A, 2 Copies)
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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 9 7

PAGE (3)

1 OF 5

TITLE (4)

MISSED ASME SECTION XI SURVEILLANCE

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 NUMBERS(S)													
1	2	6	9	1	9	1	0	3	6	0	1	0	2	1	2	9	2						
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)			<div style="display: flex; justify-content: space-between;"> <div> 20.402(b) 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) </div> <div> 20.405(C) 50.36(c)(1) 50.36(c)(2) 50.73(a)(2)(i) 50.73(a)(2)(ii) 50.73(a)(2)(iii) </div> <div> 50.73(a)(2)(iv) 50.73(a)(2)(v) 50.73(a)(2)(vii) 50.73(a)(2)(viii)(A) 50.73(a)(2)(viii)(B) 50.73(a)(2)(x) </div> <div> 77.71(b) 73.73(c) OTHER (Specify in Abstract below and in Text, NRC Form 366A) </div> </div>																				

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
R. E. Fuller, Compliance Engineer	<div style="display: flex; justify-content: space-between;"> <div>AREA CODE</div> <div>5 0 9 3 7 7 - 4 1 4 8</div> </div>

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT (16)

On December 26, 1991, a missed ASME Section XI Inservice Test for Fuel Pool Cooling (FPC) relief valve, FPC-RV-117B, was determined to violate the requirements of Technical Specification Sections 4.0.2 and 4.0.5. This oversight was identified by the In-Service Testing (IST) Program Leader on December 20, 1991.

The initial corrective action was to declare FPC-RV-117B inoperable. There are no Technical Specification operability requirements for the Fuel Pool Cooling System, therefore no action statements were required to be entered.

The root causes for this event were identified to be Managerial Methods Did Not Ensure Sufficient Interdepartmental Communication, and Inadequate Documentational Provisions in the procedure resulted in inadequate verification that program requirements were satisfied.

The corrective actions include performing the required ASME surveillance testing on FPC-RV-117B, and revising the affected Plant surveillance procedure to include a description of the program requirements, assignment of responsibilities, and documentation verification provisions.

There is no safety significance associated with this event. There was no condition that challenged the operation of this relief valve. Testing on January 27, 1992 verified that the valve was capable of performing its safety function. This event posed no threat to the health or safety of the public or of Plant personnel.

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TITLE (4) MISSED ASME SECTION XI SURVEILLANCE													

Plant Conditions

Power Level - 100%

Plant Mode - 1

Event Description

On December 26, 1991, a missed ASME Section XI Inservice Test for Fuel Pool Cooling (FPC) relief valve, FPC-RV-117B, was determined to violate the requirements of Technical Specification Sections 4.0.2 and 4.0.5. This oversight was identified by the In-Service Testing (IST) Program Leader on December 20, 1991.

Plant Technical Specification Surveillance Procedure PPM 7.4.0.5.20 is performed annually to test designated safety related relief valves as required by the ASME Boiler and Pressure Vessel Code, Section XI. The procedure and program controls are intended to ensure that all valves are tested within the required five years. FPC-RV-117B needed to be tested during the 1991 refueling outage, R-6, to satisfy the ASME Code five year requirement. FPC-RV-117B was last tested April 8, 1986 and was later found to have not been tested during the R-6 outage.

Immediate Corrective Action

FPC-RV-117B was declared inoperable December 26, 1991. There are no Technical Specification operability requirements for the Fuel Pool Cooling System, therefore no action statements were required to be entered. The valve was scheduled to be tested.

Further Evaluation and Corrective Action

A. Further Evaluation

1. This event is reportable per 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by the Plant's Technical Specifications. Technical Specification Section 4.0.5 requires, in part, that inservice testing of ASME Code Class 1, 2, and 3 valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50, Section 50.55a(g). The Code requires that all valves must be tested at least every five years. FPC-RV-117B was last tested on April 8, 1986. The last date for testing the valve within the five year Code requirement was the last day of the R-6 refueling outage. After completion of the refueling outage, the valve should have been declared inoperable until testing was performed.
2. There were no other structures, components, or systems inoperable prior to the event which contributed to the event.

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3. The root causes for this event are: 1) Managerial Methods Did Not Ensure Sufficient Interdepartmental Communication; and 2) Inadequate Documentational Provisions in the procedure resulted in inadequate verification that program requirements were satisfied. Decreased involvement by the Plant Technical Engineer in the relief valve testing program revealed deficiencies in the process that resulted in the missed surveillance. More direct involvement of the Plant Technical Engineer in previous surveillances had provided the barrier to the root causes of this event.

- 3.1 With respect to the first root cause, there was not enough communication between the Plant Technical and Plant Maintenance Departments to ensure the responsibilities of each organization were clearly understood, the responsibilities and expectations of individuals implementing the program were well enough defined, and the program process was described in enough detail to preclude unintentional omission of key elements. From Plant startup through 1989, a Plant Technical Engineer had an active involvement in the implementation of the Technical Specification required relief valve testing program. Key personnel in the program included a Plant Maintenance Engineer who was responsible for the valve testing, a Plant Technical Engineer who assumed responsibility for the program implementation, and the In-Service Testing (IST) Program Leader who reviewed changes in the procedure for ASME code compliance. Through control of certain key program tasks not specifically assigned to any organization, the Plant Technical Engineer was able to ensure successful implementation of the program. The program requirements and process were not documented but were well understood by the Plant Technical Engineer.

In 1990, the Plant Maintenance Engineer assumed many of the key program tasks previously performed by the Plant Technical Engineer, but did not assume all of the responsibilities necessary for ensuring the program requirements were satisfied. He believed that the Plant Technical Department still provided the oversight function. With discontinued involvement in key program tasks, the Plant Technical Engineer assumed that the IST Program Leader had accepted the responsibility for ensuring the program would be implemented correctly, and had minimal involvement in the 1990 testing program. However, the IST Program Leader believed that it was the Plant Maintenance Engineer's responsibility to ensure correct implementation of the program, and provided minimal overview during the outage.

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During the early stages of planning for the 1991 refueling outage, FPC-RV-117B was scheduled to be tested after the refueling outage. The Maintenance Engineer did not recognize that this was inconsistent with the ASME code requirements, and hence, a potential Technical Specification violation. The Maintenance Engineer was confident that the code requirements would be satisfied if testing was performed before the end of the calendar year. The procedure did not specify the precise surveillance interval. The Maintenance Engineer also believed that the Plant Technical Department was performing an overview function of the program implementation, including scheduling, to ensure Code compliance. The Plant Technical Department was not required by procedure to provide, nor did it, initiate a review of the 1991 test program implementation during the outage. Overview of the valve test program occurred after the Code allowable surveillance interval for FPC-RV-117B had elapsed.

There was insufficient communication between the Plant Technical and Plant Maintenance Departments to ensure the test program was completed satisfactorily within the allowable test interval. The documentation of the program requirements and organizational responsibilities was inadequate to ensure proper program completion without effective communications. In addition, the responsibilities of the individuals charged with implementing the program were not clearly defined.

- 3.2 The second root cause of the event was inadequate documentary provisions in the procedure to provide verification that all program requirements were satisfied within the allowed surveillance interval. The procedure required no signature verification to ensure that all ASME required testing had been performed satisfactorily prior to the end of the refueling outage. Independent review of the test results was not required to be completed within the test interval to preclude unintentional omission of an ASME required test. A documentary provision requiring the IST program leader verify program requirements had been satisfied prior to the end of the refueling outage would have likely precluded this event.

4. The ASME required surveillance testing completed on January 27, 1992, verified FPC-RV-117B was capable of performing its safety function.
5. The snubber program is implemented through a surveillance procedure. This procedure was reviewed for similar deficiencies and found to be adequate.

B. Further Corrective Action

1. Plant Procedure PPM 7.4.0.5.20 will be revised to provide an improved program description of the process and requirements to assure that key program elements are not inadvertently omitted in future procedure revisions.

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2. Plant Procedure PPM 7.4.0.5.20 will be revised to include independent verification documentation provisions to ensure all required valves are tested within the allowed surveillance period.
3. Plant Procedure PPM 8.3.1 will be revised to clarify the responsibilities of the ASME safety relief valve program.

Safety Significance

There is no safety significance associated with this event. Should one of the two FPC trains be unavailable, the second train can maintain pool water temperature below 155 degrees F. The WNP-2 FSAR Section 9.1.3.3 states "One of the two 50% capacity FPC trains is adequate to prevent fuel pool boiling by a large margin." There was no condition that challenged the operation of this relief valve. The test history of this valve, and its companion valve on the other train indicate they would perform their safety function, even after extended periods of service. Also, only one of the two trains was affected. Testing on January 27, 1992 verified that the valve was capable of performing its safety function. This event posed no threat to the health or safety of the public or of Plant personnel.

Similar Events

LER 91-13 documents a similar event where ASME required quarterly surveillances of selected valves of the Main Steam Leakage Control (MSLC) System were missed. The ASME surveillance procedure for the valves had a precaution to test them only during cold shutdown which conflicted with the quarterly surveillance requirement. Justification was provided to allow them to be tested during cold shutdown.

EIIS Information

Text Reference

Relief Valve for Fuel Pool
Cooling and Cleanup System

System

DA

EIIS Reference

Component

RV

Main Steam System

SB

V

