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ACCESSION NBR:9203060223 DOC.DATE: 92/02/27 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 92-004-00:on 920227,scram discharge volume level  
 switches not tested post scram as required.Caused by testing  
 not being performed.Corrective actions were not required.  
 W/920227 ltr.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

February 27, 1992  
G02-92-052

Docket No. 50-397

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U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

**SUBJECT: NUCLEAR PLANT WNP-2, OPERATING LICENSE NPF-21  
LICENSEE EVENT REPORT NO. 92-004**

Transmitted herewith is Licensee Event Report No. 92-004 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)  
INPO Records Center - Atlanta, GA  
Ms. Dottie Sherman, ANI  
Mr. D. L. Williams, BPA (Mail Drop 399)

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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 4

TITLE (4)

SCRAM DISCHARGE VOLUME LEVEL SWITCHES NOT TESTED POST SCRAM AS REQUIRED

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)	
0	1	3	1	9	2	9	2	0	0	4	0	0
0	1	3	1	9	2	9	2	0	0	4	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)	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(C)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 77.71(b)
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.73(c)
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
D. A. Swank, Compliance Engineer	
AREA CODE	
5 0 9 3 7 7 - 4 4 5 1	

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)

<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)

ABSTRACT (16)

On January 31, 1992 a Reportability Evaluation was completed and it was concluded that the post scram testing performed for the scram discharge volume scram and control rod block level instrumentation after each scram from a pressurized condition did not meet the Technical Specification requirements.

No immediate corrective action was required. A CFT of the scram discharge volume scram and control rod block level instrumentation had been performed on January 15 and 16, 1992 to satisfy the quarterly testing requirements for these switches. This quarterly testing is equivalent to the testing required after each scram from a pressurized condition.

The root cause of this event was the required testing was not performed due to procedures which were less than adequate. Further corrective actions include development of new procedures to perform the CFT post scram and ongoing activities by a Quality Action Team authorized to address potential improvements in Technical Specification compliance at WNP-2.

This event had no safety significance. The scram discharge volume level switches are redundant, were checked post scram to verify they reset, and are tested quarterly by a CFT to ensure operability.

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

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION							
FACILITY NAME (1)  Washington Nuclear Plant - Unit 2	DOCKET NUMBER (2)  0   5   0   0   0   3   9   7	LER NUMBER (8)			PAGE (3)		
		Year	Number	Rev. No.			
		92	004	00	2	OF	4.
TITLE (4) SCRAM DISCHARGE VOLUME LEVEL SWITCHES NOT TESTED POST SCRAM AS REQUIRED							

### Plant Conditions

Power Level - 100%  
Plant Mode - 1

### Event Description

On January 31, 1992 a Reportability Evaluation was completed and it was concluded that the procedures used to perform a Channel Functional Test (CFT) of the scram discharge volume scram and control rod block level instrumentation after each scram from a pressurized condition did not meet the Technical Specification definition of a CFT. The procedure did not include "the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY including alarm and/or trip functions" as required for a CFT and as included in the quarterly CFT for these switches. Technical Specification Surveillance Requirement 4.1.3.1.4.b requires that this CFT be performed after each scram from a pressurized condition.

On January 15, 1992, during the biennial review of a Plant procedure, it was found that the procedure did not perform the testing of the scram discharge volume levels switches called for in the FSAR. A detailed review of this concern led to the conclusion on January 31 that, in addition to the FSAR requirements, the Technical Specification Surveillance Requirements had also not been met.

### Immediate Corrective Action

No immediate corrective action was required. A CFT of the scram discharge volume scram and control rod block level instrumentation, performed quarterly in addition to after each scram from a pressurized condition, had been performed on January 15 and 16, 1992. Since this was after the last Plant scram, the requirement to test the switches after the last scram was satisfied and no further testing was required.

### Further Evaluation and Corrective Action

#### A. Further Evaluation

The scram discharge volume is a set of two pipes used to contain the water discharged from the control rod drives mechanisms (CRDM) during a scram. These volumes are provided with redundant level switches which supply a trip signal to the Reactor Protection System, and a rod block trip to the control rod drive manual control system, when the levels are too high. The level switches and associated level indications ensure that there is sufficient space available in the volumes to accept the water from the CRDMs should a scram occur.

The Technical Specification requirement to perform a CFT of the scram discharge volume scram and control rod block level instrumentation after each scram from a pressurized condition was not performed in a manner that satisfied the Technical Specification definition of a CFT. The procedures required a

**LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION**

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (8)			PAGE (3)		
Washington Nuclear Plant - Unit 2	0   5   0   0   0   3   9   7	Year	Number	Rev. No.			
		9   2	0   0   4	0   0	3	OF	4
TITLE (4) SCRAM DISCHARGE VOLUME LEVEL SWITCHES NOT TESTED POST SCRAM AS REQUIRED							

check to verify that the level switches reset when the scram discharge volumes were drained. The procedures did not, however, include the injection of a simulated signal as close as practicable to the sensor or a check of the trip function. Not satisfying the Surveillance Requirement is a condition prohibited by the Technical Specifications and is reported pursuant to the requirements of 10CFR50.73(a)(2)(i)(B).

As described in LER 91-013, the Supply System, using contract engineers, performed an extensive Surveillance Procedure verification effort in 1991 to identify potential areas of noncompliance. That effort identified the problem described by this LER. Plant Staff review at that time, however, incorrectly concluded that although the procedures needed to be modified for greater clarity, Technical Specification compliance was achieved by the procedures as written.

The root cause of this event was the required testing was not performed due to procedures which were less than adequate. The subject procedures did not require that a complete CFT as defined in the Technical Specifications be performed following each scram from a pressurized condition.

No structures, systems, or components were inoperable prior to the start of this event that contributed to the event.

**B: Further Corrective Action**

1. New Plant procedures are being developed to test the scram discharge volume scram and control rod block level instrumentation after each scram from a pressurized condition. Until these procedures are approved for use, should a scram occur, the procedures used for quarterly testing of the level switches will be used to satisfy the Technical Specification requirements.
2. As documented in WNP-2 LER 91-013-02, a Quality Action Team has been authorized to address potential improvements in Technical Specification compliance.

**Safety Significance**

Channel Functional Testing of the scram discharge volume scram and control rod block level instrumentation after each scram from a pressurized condition was included in the Technical Specifications to ensure the level switches were functional following effects of a scram transient on the scram discharge volume level switches. Functionality of these switches was verified to some degree by the fact that the switches tripped on a scram and reset when the scram discharge volume was drained. In addition, a CFT of the switches and logic was also performed on a quarterly basis. This testing, combined with the redundancy of the switches, provides a high degree of confidence that the scram discharge volume level switches were capable of performing their intended safety functions. This event is deemed to have had no safety significance.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION							
FACILITY NAME (1)  Washington Nuclear Plant - Unit 2	DOCKET NUMBER (2)  0   5   0   0   0   3   9   7	LER NUMBER (8)			PAGE (3)		
		Year	Number	Rev. No.			
		9   2	0   0   4	0   0	4	OF	4
TITLE (4) SCRAM DISCHARGE VOLUME LEVEL SWITCHES NOT TESTED POST SCRAM AS REQUIRED							

### Similar Events

LER 91-013 documented several instances of failures to meet the surveillance requirements. Subsequent failures to meet the Technical Specifications were documented in LERs 91-018, 91-019, 91-028, 91-036, and 92-002. Specific corrective actions to address these problems were identified in the LERs. In addition, a Quality Action Team was authorized to address potential improvements in Technical Specification compliance at WNP-2. The work of this team is progressing.

### EIIS Information

#### Text Reference

Scram Discharge Volume  
Control Rod Drive Mechanism  
Reactor Protection System  
Main Steam Leakage Control

#### EIIS Reference

<u>System</u>	<u>Component</u>
AA	TK
AA	DRIV
JC	--
SB	--