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 RECIP. NAME: RECIPIENT AFFILIATION

SUBJECT: LER 92-011-00: on 920305, discovered that method of CRD hydraulic isolation did not meet TS requirements. Caused by less than adequate procedures due to omission of relevant info in procedure. Exhaust water valve closed. W/920404 ltr.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

April 4, 1992
G02-92-079

Docket No. 50-397

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

**SUBJECT: NUCLEAR PLANT WNP-2, OPERATING LICENSE NPF-21
LICENSEE EVENT REPORT NO. 92-011**

Transmitted herewith is Licensee Event Report No. 92-011 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
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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)

TECHNICAL SPECIFICATION VIOLATION CAUSED BY IMPROPER ISOLATION OF CONTROL ROD DRIVE 42-59

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	3	0	5	9	2	9	2	0	1	1	0	0
0	3	0	5	9	2	9	2	0	4	0	1	9
									0 5 0 0 0			
									0 5 0 0 0			

OPERATING MODE (9) 1 THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

POWER LEVEL (10)	0	0	6	20.402(b)	20.405(C)	50.73(a)(2)(iv)	77.71(b)
				20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.73(c)
				20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
				20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
				20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
				20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
P. L. Powell, Licensing Engineer	AREA CODE 5 0 9 3 7 7 - 4 2 8 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)

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

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

ABSTRACT (16)

On March 5, 1992 a Reportability Evaluation was completed that concluded that the method of Control Rod Drive hydraulic isolation did not meet Technical Specification requirements. The condition was identified by the Assistant Operations Manager approximately 2339 hours on February 22, 1992. A different method of isolation, specified by plant procedures, had been implemented at 0130 on February 22, 1992 that did not specify closure of the exhaust water valve as does Technical Specification Action statement 3.1.3.1.b.2. As a result the plant remained in non-compliance with the WNP-2 Technical Specifications from approximately 0130 to 2339 on February 22, 1992.

The root cause of this event was less than adequate procedures due to the omission of relevant information in that PPM 2.1.1, Control Rod Drive System Operating Procedure, did not contain the Technical Specification requirement to close the exhaust water valve, CRD-V-105, to affect hydraulic isolation of the CRD.

Immediate corrective action was taken to close the exhaust water valve. To prevent recurrence, PPM 2.1.1 was deviated to include closure of the exhaust water valve when hydraulically isolating a CRD.

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

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							9 2	0 1 1	0 0	2 OF 4	
TITLE (4) TECHNICAL SPECIFICATION VIOLATION CAUSED BY IMPROPER ISOLATION OF CONTROL ROD DRIVE 42-59											

Plant Conditions

Power Level - 6%

Plant Mode - 1

Event Description

On March 5, 1992 a Reportability Evaluation was completed that concluded that the implemented method of Control Rod Drive hydraulic isolation did not comply with Technical Specification Action Statement 3.1.3.1.b.2.

At 0600 on February 21, 1992, Operations personnel noted that drywell unidentified leakage increased from 0.3 gpm to 3 gpm. Chemistry analysis concluded that leak was feedwater or condensate, not Reactor Coolant leakage. The leakage remained below Technical Specification limits. On 2/22/91, while repositioning control rods (deep-shallow exchange), operations personnel received a rod drift alarm and noted that rod 42-59 had moved from position 46 to position 06. Operations reduced power and fully inserted the rod in accordance with procedures. Attempts to move the rod with normal drive pressures were unsuccessful. Operations personnel consulted with the Shift Technical Advisor, declared the rod inoperable and hydraulically isolated the rod.

Plant procedure PPM 2.1.1 (Control Rod Drive System operating procedure) provided direction for hydraulically isolating CRDs by closing the drive water valve (CRD-V-103), the charging water valve (CRD-V-113) and the withdraw riser valve (CRD-V-102). The WNP-2 Technical Specifications direct that both the drive and exhaust water isolation valves (CRD-V-103 and 105) be closed to hydraulically isolate the control rod. PPM 2.1.1 did not specify closure of the exhaust water valve, CRD-V-105. As a result the plant was in non-compliance with the WNP-2 Technical specifications until approximately 2339 on February 22, 1992.

Immediate Corrective Action

Upon recognition by the Assistant Operations Manager that the valve isolation was not in accordance with the Technical Specifications, the clearance order was amended and the exhaust water valve was closed.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION												
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TITLE (4) TECHNICAL SPECIFICATION VIOLATION CAUSED BY IMPROPER ISOLATION OF CONTROL ROD DRIVE 42-59										3	OF	4

Further Evaluation and Corrective Action

A. Further Evaluation

This event is being reported per the requirements of 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the WNP-2 Technical Specifications in that the lineup for isolation used, in accordance with plant procedures, did not specify closure of the exhaust water valve.

The root cause of this event was less than adequate procedures due to the omission of relevant information in that PPM 2.1.1 did not contain the Technical Specification requirement to close the exhaust water valve, CRD-V-105, when hydraulically isolating a CRD. A review of the changes to PPM 2.1.1 has confirmed that the method of isolation, without CRD-V-105, has been the same since plant startup. The PPM did include closure of CRD-V-102 (withdraw riser valve) which provides an equivalent degree of isolation as closing the exhaust water valve.

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

Further evaluation showed that the lineup specified by PPM 2.1.1 is the method specified in the Contractor Vendor Information Manual and, as stated above, provides the same level of isolation as does closing the exhaust water isolation valve per the Technical Specification Action Statement.

As described in LER 91-013, the Supply System, using contract engineers, performed a Surveillance Procedure verification effort in 1991 to identify potential areas of noncompliance. The scope of that effort was limited to Surveillance Requirements and supporting procedures. Because the requirement to close the drive and exhaust water isolation valves is in an Action Statement, discovery of this noncompliance was beyond the scope of that review.

The rod drift occurred with the reactor at 70% power. There is no evidence of adverse effects on the fuel.

When the rod was isolated, operations personnel noted an increase in drywell particulate monitor readings. The sequence of drift, isolation and particulate increase led to the conclusion that the leak originated in the CRD system. Plant management decided to reduce power, de-inert containment and ascertain the leak source.

The leakage was localized to the CRD flange. The leakage was evaluated and determined acceptable for continued operations. However, the leakage was repaired where the unit shutdown shortly thereafter for reasons unrelated to the CRD.

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) Year Number Rev. No. 9 2 0 1 1 0 0			PAGE (3) 4 OF 4		
TITLE (4) TECHNICAL SPECIFICATION VIOLATION CAUSED BY IMPROPER ISOLATION OF CONTROL ROD DRIVE 42-59												

B. Further Corrective Action

PPM 2.1.1 was deviated on March 3, 1992 to include isolating CRD-V-105 when hydraulically isolating a Control Rod Drive.

As documented in WNP-2 LER 91-013-02, a Quality Action Team has been authorized to address potential improvements in Technical Specification compliance. Recommendations from this team are expected by April 15, 1992.

Safety Significance

There is no safety significance associated with this event as the isolation detailed in the Contractor Vendor Information, and specified by PPM 2.1.1, provided the same level of isolation as does closing the exhaust water isolation valve. Because the isolation used provides an alternate and equivalent isolation this event is deemed to have had no safety significance.

Similar Events

LERs 91-013, 018, 019, 028, 036, 92-002 documented several instances of failures to meet Technical Specification Surveillance Requirements. Specific corrective actions to address these problems were identified in the LERs. This report is similar with the exception that it documents a failure to comply with specific details of a Technical Specification Action statement. As reported in the LERs above a Quality Action Team was authorized to address potential improvements in Technical Specification compliance at WNP-2. The work of this team is in progress.

EIIS Information

Text Reference

Control Rod Drive System
CRD 42-59
CRD-V-105
CRD-V-103
CRD-V-113
CRD-V-102

EIIS Reference System Component

AA	---
AA	ROD
AA	ISV
AA	ISV
AA	ISV
AA	ISV

