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 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-036-00: on 920719, primary containment lighting circuit  
 not deenergized as required by Tech Specs. Caused by  
 technical inaccuracy in procedure for plant startup. Plant  
 startup procedures & drywell entry revised. W/920814 ltr.

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August, 14, 1992  
602-92-196

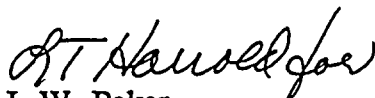
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**SUBJECT: NUCLEAR PLANT WNP-2, OPERATING LICENSE NPF-21  
LICENSEE EVENT REPORT NO. 92-036**

Transmitted herewith is Licensee Event Report No. 92-036 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,

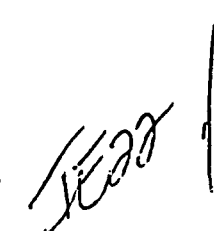


J. W. Baker  
WNP-2 Plant Manager (Mail Drop 927M)

JWB/RJP/cgeh  
Enclosure

cc: Mr. J. B. Martin, NRC - Region V  
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INPO Records Center - Atlanta, GA  
Mr. D. L. Williams, BPA (Mail Drop 399)

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**LICENSEE EVALUATION REPORT (LER)**

FACILITY NAME (1)														DOCKET NUMBER (2)							PAGE (3)						
Washington Nuclear Plant - Unit 2														0	5	0	0	0	3	9	7	1	OF	4			
TITLE (4)																											
PRIMARY CONTAINMENT LIGHTING CIRCUIT NOT DEENERGIZED AS REQUIRED BY TECHNICAL SPECIFICATIONS DUE TO PROCEDURAL INADEQUACY																											
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	7	1	9	9	2	9	2	--	0	3	6	--	0	0	0	8	1	3	9	2	0	5	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)													
2																											
POWER LEVEL (10)		20.402(b)				20.405(C)				50.73(a)(2)(iv)				77.71(b)													
0		20.405(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.73(c)													
0		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)													
5		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													
M. P. Reis, Compliance Supervisor														AREA CODE													
														5	0	9	3	7	7	-	4	1	5	2			
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) X												NO															

On July 19, 1992, it was identified that the procedure for plant startup from cold shutdown did not require timely deenergization of primary containment lighting circuits. Technical Specifications require that these circuits be deenergized when the plant is in Operational Condition 1, 2 or 3, except during entry to the drywell, and allows these circuits to be energized for one hour when drywell entry is not in progress.

The root cause of this event was technical inaccuracy in the procedure for plant startup. As corrective action, plant startup procedures and the drywell entry procedure will be revised to provide instructional guidance directing deenergization of containment lighting circuits following completion of drywell entries. The condition described in this report was not safety significant, and did not involve failure of any plant components or systems.

LICENSEE EVENT REPORT (ER) 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	03	6	00	2	OF	4
TITLE (4) PRIMARY CONTAINMENT LIGHTING CIRCUIT NOT DEENERGIZED AS REQUIRED BY TECHNICAL SPECIFICATIONS DUE TO PROCEDURAL INADEQUACY														

### Plant Conditions

Power Level -  $\approx$ 5%

Plant Mode - 2

### Event Description

On July 21, 1992, it was determined that plant procedure PPM 3.1.2, "Reactor Plant Cold Startup," did not adequately address Technical Specification requirements regarding deenergization of primary containment electrical circuits. This condition was first identified as a concern by Quality Assurance personnel during routine surveillance of plant startup activities on July 19, 1992.

Technical Specification 3.8.4.1 requires that primary containment lighting circuits be deenergized when the plant is in Operational Condition 1, 2 or 3, except during entry to the drywell. The purpose of this Technical Specification is to protect the integrity of primary containment electrical penetrations in the event of an overcurrent or fault condition on a primary containment lighting circuit. The Action Statement for this Technical Specification allows primary containment lighting circuits to be energized for one hour when a drywell entry is not in progress.

Drywell inspections are typically performed during plant startup at 400 psig and 920 psig reactor pressure. PPM 3.1.2 states that it is not necessary to deenergize primary containment lighting circuits following the 400 psig inspection if a subsequent entry is planned at 920 psig. As a result, primary containment lighting circuits have typically remained energized between the drywell inspections that are performed during plant startup at 400 and 920 psig reactor pressure.

Reactor pressure increase is procedurally limited to 6 psig/min. between 400 and 600 psig, and 8 psig/min. between 600 and 920 psig during plant startup. This results in a calculated minimum elapsed time of 74 minutes to increase reactor pressure from 400 to 920 psig. Additionally, drywell entry is not allowed during reactor power increases. It can therefore be concluded that containment lighting circuits have remained energized between drywell entries for an elapsed time in excess of that allowed by Technical Specifications during previous plant startups.

### Immediate Corrective Actions

No immediate corrective actions were required. WNP-2 was in full compliance with the requirements of Technical Specification 3.8.4.1 at the time it was determined that plant procedure PPM 3.1.2, "Reactor Plant Cold Startup," did not adequately address requirements regarding deenergization of primary containment electrical circuits.

LICENSEE EVENT REPORT (ER) TEXT CONTINUATION															
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Washington Nuclear Plant - Unit 2		0	5	0	0	0	3	9	7	Year	Number	Rev. No.			
		9	2							0	3	6	0	0	
TITLE (4)		PRIMARY CONTAINMENT LIGHTING CIRCUIT NOT DEENERGIZED AS REQUIRED BY TECHNICAL SPECIFICATIONS DUE TO PROCEDURAL INADEQUACY													

## Further Evaluation and Corrective Action

### Further Evaluation

This event is considered reportable under 10CFR50.73(a)(2)(i)(B) as a condition resulting in plant operation that was not in accordance with the plant Technical Specifications. Primary containment lighting circuits remained energized for an elapsed time in excess of that allowed by Technical Specifications during previous plant startups.

The root cause of this event was a technical inaccuracy in procedure PPM 3.1.2. This procedure incorrectly stated that it was acceptable to leave primary containment lighting circuits energized following completion of the drywell inspection that is performed during plant startup at 400 psig reactor pressure if a subsequent entry was planned at 920 psig.

The condition described in this report did not involve any structures, components, or systems that were inoperable at the start of the event, nor did it involve failure of a plant component or system.

### Further Corrective Action

Procedure PPM 3.1.2 will be revised to provide instructional guidance that will ensure containment lighting circuits are deenergized during reactor startup following completion of the 400 psig drywell entry. Additionally, a condition similar to that described for PPM 3.1.2 has also been identified in the following plant procedures: PPM 3.1.3, "Reactor Startup from Hot Shutdown," and PPM 1.9.3A, "Personnel Entry Into Drywell". These procedures will also be revised to provide instructional guidance directing deenergization of containment lighting circuits following completion of drywell entries. Changes to procedures PPM 1.9.3A, PPM 3.1.2, and PPM 3.1.3 are scheduled for completion by September 30, 1992.

### Safety Significance

The purpose of Technical Specification 3.8.4.1 is to protect the integrity of primary containment electrical penetrations in the event of an overcurrent or fault condition on a primary containment lighting circuit. Primary containment lighting circuits did not experience an overcurrent or fault condition during the period when they were energized in a manner that was not in accordance with Technical Specifications. Therefore, the condition described in this report was not safety significant. However, even if an overcurrent or fault condition had existed, Non-1E protection located upstream of the electrical penetrations associated with these primary containment lighting circuits would have been available.

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)				
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TITLE (4) PRIMARY CONTAINMENT LIGHTING CIRCUIT NOT DEENERGIZED AS REQUIRED BY TECHNICAL SPECIFICATIONS DUE TO PROCEDURAL INADEQUACY															

### Similar Events

Previous instances involving failure to enter a Technical Specification Action Statement as a result of procedural inadequacy have been documented in LERs 92-011 and 91-019. Both of these LERs involved plant procedures that directed actions which resulted in Action Statement entry, but did not provide sufficient guidance to ensure that this condition was recognized. Specific corrective actions for these previous events were identified within each of the respective LERs.

### EIIS Information

#### Text Reference

#### EIIS Reference

#### System                      Component

Primary Containment/Drywell  
Primary Containment Lighting Circuit Breaker

NH                      --  
FF                      52