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 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-043-00: on 921202, operator actions inadequately represented in procedures used to implement app R shutdown analysis requirements. Cause still under investigation. No corrective actions were necessary. W/930104 ltr.

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January 4, 1993
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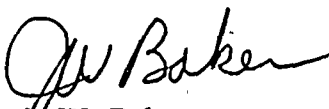
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Washington, D.C. 20555

**SUBJECT: NUCLEAR PLANT WNP-2, OPERATING LICENSE NPF-21
LICENSEE EVENT REPORT NO. 92-043-00**

Transmitted herewith is Licensee Event Report No. 92-043 for the WNP-2 Plant. This report is submitted in response to the report requirements of 10CFR50.73. Final results from an ongoing root cause determination and corrective actions will be provided in a supplement to this report.

Sincerely,

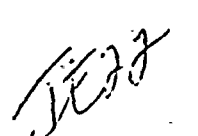


J. W. Baker
WNP-2 Plant Manager (Mail Drop 927M)

JWB/RJP/nw
Enclosure

cc: Mr. J. B. Martin, NRC - Region V
Mr. R. Barr, NRC Resident Inspector (Mail Drop 901A, 2 Copies)
INPO Records Center - Atlanta, GA
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)

OPERATOR ACTIONS INADEQUATELY REPRESENTED IN PROCEDURES USED TO IMPLEMENT APPENDIX R SHUTDOWN ANALYSIS REQUIREMENTS

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

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)		20.402(b)	20.405(c)	50.73(a)(2)(iv)	77.71(b)
		20.405(a)(1)(i)	50.36(c)(1)	<input checked="" type="checkbox"/> 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)	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				
R. J. Poche', Licensing Engineer	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 15%;">AREA CODE</th> <th style="width: 85%;">NUMBER</th> </tr> <tr> <td>5</td> <td>0 9 3 7 7 - 4 1 4 5</td> </tr> </table>	AREA CODE	NUMBER	5	0 9 3 7 7 - 4 1 4 5
AREA CODE	NUMBER				
5	0 9 3 7 7 - 4 1 4 5				

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs

SUPPLEMENTAL REPORT EXPECTED (14)

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

MONTH	DAY	YEAR
01	31	93

ABSTRACT (16)

It was identified that procedures for performing Alternate Shutdown Cooling were not supported by the indication range of fire protected reactor vessel level instruments in the Main Control Room or at the Remote and Alternate Shutdown Panels. Also, fans that were expected to be shut off after a fire were misidentified in procedures. These conditions could have degraded the ability to shutdown the plant or remove residual heat following a fire. Other weaknesses were also identified with regard to Shutdown Analysis directed operator actions.

The root cause of these conditions is still under consideration. Procedures for performing Alternate Shutdown Cooling were changed and other procedure deficiencies have been corrected. The described conditions did not involve failure of any plant components or systems. A supplemental LER will be submitted with final root causes and corrective actions.

WNP-2 has not experienced a fire that required plant shut down. Fire detection and suppression systems, and fire barriers were available to mitigate a fire if it had occurred. Consequently, the conditions described in this report are not safety significant.

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		Year	Number	Rev. No.			
		92	043	00	2	OF	4
TITLE (4) OPERATOR ACTIONS INADEQUATELY REPRESENTED IN PROCEDURES USED TO IMPLEMENT APPENDIX R SHUTDOWN ANALYSIS REQUIREMENTS							

Plant Conditions

Power Level - 100%

Plant Mode - 1

Event Description

On November 12, 1992, an Operations Department engineer, during a review of procedural implementation for fire related operator actions, identified that fire protected level indication in the Main Control Room and at both the Remote and Alternate Shutdown Panels did not provide sufficient range to support existing procedures for Alternate Shutdown Cooling. The instrument range for fire protected level indicators is -150 inches to +60 inches; however, Alternate Shutdown Cooling requires flooding of the reactor vessel up to the level of the Main Steam Lines (+108"). As a result of this condition, operators may not have had accurate level indication following a fire.

While investigating this issue, other discrepancies between the Appendix R Shutdown Analysis and plant procedures were noted. On December 2, 1992, it was determined that the level instrument problem and a separate discrepancy involving misidentified fans could have resulted in degraded ability to shutdown the plant or remove residual heat in the event of a fire.

Immediate Corrective Actions

No immediate corrective actions were necessary. However, procedures have been revised to provide appropriate direction for operator actions in response to a fire.

Further Evaluation and Corrective Action

Further Evaluation

The Shutdown Analysis assumes that Operators may be required to use Alternate Shutdown Cooling methods to remove residual heat following a fire because equipment necessary for normal shutdown evolutions is not totally fire protected. Due to inadequate level instrument range, and the lack of an alternatively specified method for determining vessel water level above +60 inches, it was concluded that procedures guiding decay heat removal operations from the Main Control Room and Alternate and Remote Shutdown Panels were deficient.

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The Shutdown Analysis also requires that fans WMA-AH-52B and WMA-AH-53B be secured in the event of a fire in one Radwaste Building area. These fans were incorrectly identified in procedures as WMA-AH-52A and 53A, respectively. Continued operation of these fans following a fire might have spread smoke and hot gasses to critical switchgear and other areas containing vital equipment. The fans were misidentified due to an error in an engineering memorandum to Operations.

On December 2, 1992, the above conditions were determined to be reportable under 10CFR50.72(b)(2)(iii), and necessary notifications were made. These conditions are also reportable under 10CFR50.73(a)(2)(v) as conditions that alone could have prevented fulfillment of the safety function of structures or systems that are needed to shut down the reactor and maintain it in a safe shutdown condition, or remove residual heat.

Other weaknesses and deficiencies identified involved actions required for fires both inside and outside the Main Control Room. These items include: fire related compensatory measures for loss of fuel pool cooling, and compensatory measures to address loss of the RHR water leg pumps. It has been determined that these weaknesses would not have significantly affected operator response to a fire.

A previous LER, 50/397 92-18 was submitted due to discrepancies between fire directed operator actions described in plant procedures and requirements of the Appendix R Safe Shutdown Analysis. As a corrective action, a commitment was made to perform a comparative review of operator actions made in plant procedures against requirements in the Safe Shutdown Analysis. When this review was performed, it did not directly compare operator actions described in procedures to the Shutdown Analysis. Instead, it used memoranda and other Engineering correspondence that were based on the Shutdown Analysis to perform the comparison. Failure to review the Shutdown Analysis against fire directed operator actions resulted in delayed identification of some items discussed in this LER.

Determination of root causes for the deficiencies described herein is still in progress.

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

1. Plant procedures were revised to reflect an acceptable method, using existing instrumentation, for achieving Alternate Shutdown Cooling operation.
2. A supplemental LER will be submitted by January 31, 1993 providing details of the final root cause and corrective actions.

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 4 3 0 0			PAGE (3) 4 OF 4	
TITLE (4) OPERATOR ACTIONS INADEQUATELY REPRESENTED IN PROCEDURES USED TO IMPLEMENT APPENDIX R SHUTDOWN ANALYSIS REQUIREMENTS											

Safety Significance

WNP-2 has not experienced a fire that could have adversely affected the ability to shut down the plant during the period when required operator actions were not adequately reflected in procedures. Furthermore, during this period, fire detection, suppression, and barrier systems were either operable or required compensatory measures had been implemented. The availability of fire detection and suppression equipment ensured the ability to promptly identify, confine, and extinguish fires, and the availability of fire barriers and barrier penetrations minimized the possibility of a fire related challenge to safety systems. Consequently, the conditions described in this report did not adversely affect safe operation of the plant, or the health and safety of plant personnel or the general public.

Similar Events

A previous occurrence involving inadequate procedural implementation of required operator actions necessary to mitigate the consequences of a fire, and Shutdown Analysis deficiencies was described in LER 92-018.

EIIS Information

Text Reference

Fuel Pool Cooling System (FPC)
Reactor Core Isolation Cooling System (RCIC)
Control Room Chiller
Service Water System (SW), valves
Radwaste Building
Reactor Building
Main Control Room
Remote Shutdown Panel
Residual Heat Removal System (RHR), pump
Cable Spreading and Switchgear Area HVAC, fans
Nuclear Steam Supply Shutoff System (NSSSS)
Alternate Shutdown Cooling

EIIS Reference

<u>System</u>	<u>Component</u>
DA	--
BN	--
KM, VI	CHU
BI	V
NE	--
NG	--
NA	--
--	PL
BO	P
VI	FAN
JM	--
BO	--