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 BAKER, J.W. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 91-019-01: on 910716, determined that failure to rept five periods in excess of 30 days of inoperability of RV seismic in violation of TS. Caused by plant procedure. C/A includes revising Plant procedure when removing frame. W/930318 ltr.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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March 18, 1993
G02-93-063

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. 91-019-01**

REFERENCE: Letter G02-93-062, dated March 18, 1993, JW Baker (SS) to JB Martin (NRC), "Seismic Monitoring Instrumentation".

Transmitted herewith is Licensee Event Report No. 91-019-01 for the WNP-2 Plant. This revised 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.

This revision removes a further corrective action to submit a Technical Specification change request to allow for relocation of the seismic monitor.

Sincerely,



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

JWB/CLF/my
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)
Mr. J. W. Clifford, NRC

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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 FOR FAILURE TO REPORT OUT OF SERVICE TIME OF SEISMIC MONITOR

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	6	9	1	9	1	0	1	9	0	1

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)

0	0	0	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

CL Fies, Licensing Engineer

TELEPHONE NUMBER

AREA CODE

5 0 9 3 7 7 - 4 1 4 7

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 July 16, 1991 Plant Management determined that the failure to report five periods in excess of 30 days of inoperability of the Reactor Vessel Head Seismic Monitor was a violation of WNP-2 Plant Technical Specifications. During each of the past five annual Maintenance and Refueling Outages, beginning in 1986, the Monitor was inoperable due to the Space Frame, to which the Monitor is attached, being moved to a temporary location so that refueling and in-vessel outage work could be accomplished.

There are two root causes for this event. The design which located the Seismic Monitor on the Space Frame did not meet the standard Technical Specification requirement for the instrument to be operable at all times. The Plant Procedure used to remove the Space Frame had no steps to inform the Shift Manager of the inoperability of the Monitor.

Corrective action includes revising the Plant procedure to include a step to notify the Shift Manager when the Space Frame is moved.

There is no safety significance associated with this event because the Monitor has no safety immediate function.

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 1 0 1 9 0 1		PAGE (3) 2 OF 4
TITLE (4) TECHNICAL SPECIFICATION VIOLATION FOR FAILURE TO REPORT OUT OF SERVICE TIME OF SEISMIC MONITOR							

Plant Conditions

Power Level - 000%

Plant Mode - 4 - Cold Shutdown

Event Description

On July 16, 1991 Plant Management determined that the failure to report the inoperability of the Reactor Vessel Head Seismic Monitor during five previous Maintenance and Refueling Outages was a violation of WNP-2 Plant Technical Specifications.

On May 16, 1991, during the R6 Maintenance and Refueling Outage a Plant System Engineer reported that the Reactor Vessel Head Seismic Monitor SEIS-TPA-1 had been inoperable for 30 days and that a Special Report to the NRC was required. Seismic Monitor SEIS-TPA-1 is attached to the Space Frame, a steel structure located between the Reactor Vessel Head and the Containment Head Structures. The Monitor SEIS-TPA-1 was inoperable because the Space Frame is moved and stored in a temporary location for refueling and in-vessel work activities. The Special Report was sent to the Commission on May 24, 1991. (Reference Supply System Letter GO2-91-107) During the time of report preparation it was realized by the Compliance Engineer preparing the report that this instrument would also have been inoperable during each of the five previous Maintenance and Refueling Outages. The Compliance Supervisor directed that this information be included in the May 24, 1991 Special Report.

Just prior to July 16, 1991 a NRC Resident Inspector requested that the reportability of this event per 10CFR50.73 be reviewed. This review was concluded on July 16, 1991 when Plant Management directed that this LER be prepared. Table 1 below lists the estimated times when the Monitor SEIS-TPA-1 was inoperable.

Estimated Times of Inoperability of SEIS-TPA-1

Maintenance and Refueling Outage	Estimated time of Inoperability of SEIS-TPA-1
R1	April - May 1986
R2	April - June 1987
R3	May - June 1988
R4	May - June 1989
R5	May - June 1990

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.			
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TITLE (4) TECHNICAL SPECIFICATION VIOLATION FOR FAILURE TO REPORT OUT OF SERVICE TIME OF SEISMIC MONITOR								

Immediate Corrective Action

None

Further Evaluation and Corrective Action

A. Further Evaluation

1. This event is reportable as a violation of WNP-2 Plant Technical Specification per 10CFR50.73(a)(2)(i)(B).
2. Technical Specification 3.3.7.2 requires the Reactor Head Vessel Head Seismic Monitor to be operable at all times. The specification also requires that: "With one or more of the seismic monitoring instruments inoperable for more than 30 days, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the instruments to operable status." This LER documents the failure to submit a Special Report for each of the previous Maintenance and Refueling Outages.
3. The cause of the delay in submitting an LER when this event was first discovered in May 1991 is Personnel Error. The Compliance Supervisor erroneously made an independent determination that reporting the information on previously missed and required Special Reports in the May 24, 1991 Special Report was sufficient and that an LER was not required.
4. There are two root causes for this event. First, the design which located the Monitor on the Space Frame did not meet standard technical specification requirements which required the instrument to be operable at all times. The second root cause is procedural inadequacy. The Plant procedure which moved the Space Frame had no step to notify the Shift Manager of the inoperability of the Monitor. The Shift Manager is responsible for tracking compliance with Technical Specification Action Statements.
5. There were no structures, systems, or components inoperable at the beginning of this event that contributed to this event.

B. Further Corrective Action

The Maintenance Procedure for moving the Space Frame was revised to include a requirement to notify the Shift Manager when SEIS-TPA-1 becomes inoperable.

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) TECHNICAL SPECIFICATION VIOLATION FOR FAILURE TO REPORT OUT OF SERVICE TIME OF SEISMIC MONITOR					

Safety Significance

There is no safety significance associated with this event. The triaxial peak accelerograph SEIS-TPA-1 is a sensitive wide band, low frequency, acceleration recording instrument. Permanent records are scribed by diamond styli on replaceable metal plates. The peak acceleration is computed by multiplying the maximum excursion of the trace by the acceleration sensitivity of the recorder. This passive instrument is used to capture the response of the space frame, a steel structure located between the reactor vessel head and containment head structures. The data collected is for subsequent engineering analysis and does not play a role in the immediate determination of Plant operability following a seismic event. Any loss of data can best be characterized as a lost opportunity to aid in the analysis to support a decision to restart should a significant seismic event have been experienced.

Similar Events

There are no similar events pertaining to the failure to submit a Special Report when required by Plant Technical Specifications.

EIIS Information

Text Reference

Reactor Vessel Head Seismic Monitor
(SEIS-TPA-1)
Space Frame
Reactor Vessel Head
Containment Head Structures

EIIS Reference

<u>System</u>	<u>Component</u>
IN	---
IH	FRM
IH	RPV
IH	---