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SUBJECT: LER 93-020-00: on 930511, MSRV position indicators not tested per TS requirements due to poor procedures, inconsistency of three specs re MSRVs & TS 3/4.3.7.5 for MSRV acoustic monitors not met at required times. W/930610 ltr.

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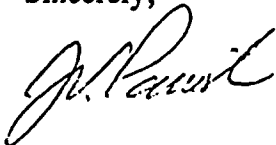
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Washington, D.C. 20555

Subject: NUCLEAR PLANT WNP-2, OPERATING LICENSE NPF-21
LICENSEE EVENT REPORT NO. 93-020

Transmitted herewith is Licensee Event Report No. 93-020 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. V. Parrish (Mail Drop 1023)
Assistant Managing Director, Operations

JVP/DAS/jd
Enclosure

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LICENSEE EVENT REPORT (LER)

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TITLE (4)
IMPROPER SCHEDULING OF MAIN STEAM RELIEF VALVE (MSRV) POSITION INDICATOR TESTING

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	5	1	1	9	3	9	3	0	2	0	0	0
0	5	1	1	9	3	9	3	0	6	1	0	9

OPERATING MODE (9) 5	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	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(C)	<input type="checkbox"/> 50.73(a)(2)(iv)
	<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"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)
	<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)
77.71(b) 73.73(c) OTHER (Specify in Abstract below and in Text, NRC Form 366A)			

LICENSEE CONTACT FOR THIS LER (12)	
NAME D. A. Swank, Licensing Engineer	TELEPHONE NUMBER 5 0 9 3 7 7 - 4 5 6 3

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	CAUSE	SYSTEM

SUPPLEMENTAL REPORT EXPECTED (14) <input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)
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ABSTRACT (16)

On May 11, 1993, a system engineer determined that the Main Steam Safety/Relief Valve (MSRV) position indicators have not always been demonstrated operable prior to entry into Mode 2 as required by Technical Specification 3/4.3.7.5. The root cause of this event was less than adequate written documents in that the procedures did not satisfy the surveillance requirements for entry into the applicable Modes, and the three MSRV Specifications are inconsistent. The MSRV position indication testing methodology has been changed to support testing prior to entry into Mode 2 in order to meet the Technical Specifications as written. In addition, a Technical Specification amendment request will be submitted to make the three applicable requirements consistent. Since other methods of detecting open MSRVs are available, this event had no safety significance or affect on the health and safety of the public.

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TITLE (4) IMPROPER SCHEDULING OF MAIN STEAM RELIEF VALVE (MSRV) POSITION INDICATOR TESTING													

Plant Conditions

Power Level - 0%

Plant Mode - 5 (Refueling)

Event Description

On May 11, 1993, a plant system engineer determined that the Main Steam Safety/Relief Valve (MSRV) position indicators (acoustic monitors or valve stem position indicators) have not been tested in accordance with the Technical Specification requirements. Technical Specification 3/4.3.7.5 requires that one position indicator per MSRV be operable prior to entry into Mode 2. This requirement has not always been met since these position indicators were sometimes tested in Mode 1 immediately following a refueling outage.

Immediate Corrective Action

The plant was in Mode 5 at the time this condition was identified. Technical Specification 3/4.3.7.5 is applicable only in Modes 1 and 2. No immediate corrective action was required.

Further Evaluation, Root Cause and Corrective Action

A. Further Evaluation

There are three Technical Specification requirements related to the MSRVs: 1) Technical Specification 3/4.3.7.5, Accident Monitoring Instrumentation; 2) Technical Specification 3/4.4.2, Safety/Relief Valves; and 3) Technical Specification 3/4.5.1, ECCS - Operating. Technical Specifications 3/4.4.2 and 3/4.5.1 contain a footnote to allow entry into the modes of applicability without having satisfied the surveillance requirements. These footnotes also require the applicable surveillance tests be performed within 12 hours after adequate reactor steam pressure is achieved. Technical Specification 3/4.3.7.5 does not include a similar note allowing entry into the applicable modes prior to satisfying the surveillance requirements.

Technical Specification 3/4.3.7.5 requires that either the acoustic monitor or valve stem position instrument for each MSRV be operable when the plant is in Modes 1 and 2. Technical Specification 3/4.3.7.5 also requires that a channel calibration, including a channel functional test, be performed for these instruments at an 18-month frequency. Past plant practice was to perform the channel calibration and channel functional test during MSRV testing. MSRV testing was completed either in Mode 1 prior to plant shutdown for, or in Mode 1 just after plant startup from, a refueling outage. Testing during plant shutdown supported identification of problems with the MSRVs or the

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associated position indication instrumentation. However, maintenance work on the MSRV position indication instrumentation during the refueling outage sometimes invalidated past surveillance test results. Since adequate steam pressure is required to stroke the MSRVs without causing excessive wear, testing could not be completed prior to entry into Mode 2 during startup.

The MSRV stem position indication system was added to the valves during refueling outage R7 in the spring of 1992. Technical Specification 3/4.3.7.5 was amended on May 15, 1992, to require either the valve stem position indication or the acoustic monitor be operable. Prior to May 15, 1992, Technical Specification 3/4.3.7.5 required that the acoustic monitor for each MSRV be operable prior to entry into Mode 2. The acoustic monitor was normally tested in Mode 1 concurrent with testing of the MSRVs. For some of the acoustic monitors, this testing occurred in Mode 1 following the refueling outages. This testing did not meet the surveillance requirement since entry into Modes 2 and 1 occurred prior to the testing.

The Technical Specifications issued in 1983 with the WNP-2 Operating License were also reviewed. A footnote permitting entry into Modes 3, 2, and 1 prior to performing MSRV testing was included in Technical Specifications 3/4.4.2 and 3/4.5.1. There was no similar footnote in Technical Specification 3/4.3.7.5.

Beginning in 1986, a test of the acoustic monitors has been performed prior to entry into Mode 2 following each refueling outage. This test checks the functionality of the monitors. However, it does not satisfy all of the requirements for a channel calibration, and thus does not satisfy Technical Specification Surveillance Requirement 4.3.7.5.

Entry into Modes 1 and 2 without satisfying Technical Specification Surveillance Requirement 4.3.7.5 is prohibited, but did occur following several of the past seven refueling outages. This is a condition prohibited by the Technical Specifications and is reportable pursuant to the requirements of 10CFR50.73(a)(2)(i)(B).

B. Root Cause

The root cause of this event was less than adequate written documents in that: 1) the written procedures failed to satisfy the surveillance requirements for the required Modes; and 2) the three Specifications related to the MSRVs are not consistent and Technical Specification 3/4.3.7.5 for the MSRV acoustic monitors could not be reasonably met at the required times.

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C. Further Corrective Action

A Technical Specification amendment request will be submitted by December 31, 1993, to include a note in Technical Specification 3/4.3.7.5 to allow entry into Modes 2 and 1 without having performed the applicable surveillance on the MSRV valve position indicators. This note will also require that the applicable surveillance testing be performed when adequate reactor steam pressure is obtained.

Until the Technical Specification amendment request is approved, a channel calibration, including a channel functional test, will be performed for the MSRV valve stem position indicators prior to entry into Mode 2. Testing prior to entry into Mode 2 is required if the most recent surveillance test is not current, or if maintenance has been performed that invalidates the last test. Testing will be performed manually with the instrument removed from the MSRV.

The Technical Specification Surveillance Improvement Program (TSSIP), previously described in detail in LER 93-10, is an ongoing program to review the surveillance procedures. This review includes verification that the procedures satisfy the Technical Specification requirements and are scheduled for performance at the correct times.

Safety Significance

The MSRV position indication instrumentation is provided to alert the control room operators to an open MSRV. There are other indications of an open MSRV such as MSRV tailpipe temperature, suppression pool temperature, and changes in reactor pressure. These position indicators do not affect MSRV function. Therefore, this event had no safety significance and did not affect health and safety of the public or plant personnel.

EIIS Information

Text Reference

EIIS Reference

Main Steam Safety/Relief Valve (MSRV)
Acoustic Monitors
MSRV valve stem position indicators
Main Steam
Reactor Feedwater
Suppression Pool
Reactor

<u>System</u>	<u>Component</u>
SB	RV
SB	MON
SB	ZI
SB	---
SJ	---
BO	TK
---	VSL