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SUBJECT: LER 95-008-00:on 940125,TS wording lead to potential TS violation.Caused by lack of clarity in TS.Submitted "improved" TS for plant to provide addl clarity.W/950512 ltr.

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May 12, 1995
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Docket No. 50-397

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: **NUCLEAR PLANT WNP-2, OPERATING LICENSE NPF-21**
LICENSEE EVENT REPORT NO. 95-008-00

Transmitted herewith is voluntary Licensee Event Report No. 95-008-00 for the WNP-2 Plant. This event is not reportable under 10CFR50.72 or 10CFR50.73. This report is submitted voluntarily for information.

Should you have any questions or desire additional information, please call me or D.A. Swank at (509) 377-4563.

Sincerely,

J. V. Parrish (Mail Drop 1023)
Vice-President, Nuclear Operations

JVP/KBL/jcs
Enclosure

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LICENSEE EVENT 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)

TECHNICAL SPECIFICATION WORDING LEADS TO A POTENTIAL FOR A TECHNICAL SPECIFICATION VIOLATION

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 1	2 5	9 4	9 5	-- 0 0 8	-- 0 0	0 5	1 2	9 5		0 5 0 0 0
										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)			
1				
POWER LEVEL (10) 1 0 0	20.402(b)	20.405(C)	50.73(a)(2)(iv)	73.71(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)	X 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
Kurt B. Lewis, Technical Specialist	AREA CODE 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 NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	
BD	SD	C I B I S SW	S 3 8 2	YES							

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

ABSTRACT (16)

On January 25, 1994, with the reactor at 100% power, WNP-2 noted a degraded condition with a reactor water level switch associated with the Nuclear Steam Supply Shutoff System (NS4) Group 4 (Traversing In-Core Probe (TIP) system) isolation logic. Actions at the time of the event included declaring the switch inoperable, entering a Technical Specification Action statement, and initiating repairs. Ongoing repair work required tripping the inoperable isolation channel in accordance with the Technical Specification requirements. The channel was restored on January 28, 1994. This voluntary report is submitted to address confusion created by the Technical Specification wording and the potential for the plant to enter a condition prohibited by the Technical Specifications due to this confusion. The root cause of this event was a lack of clarity in the Technical Specifications. Corrective actions include submittal of the "improved" Technical Specifications for WNP-2 to provide additional clarity and issuance of a Technical Specification interpretation to provide guidance for plant personnel. This event had no safety significance as the inoperable channel was tripped in accordance with the Technical Specification requirements.

Event Description

On January 25, 1994, with the reactor [RPV] at 100% power, instrument technicians observed higher than normal reactor water level indication. The cause was believed to be leakage past the seat of the equalizing valve [V, BD] for MS-LS-61D [LS, BD] which impacted the reference leg of associated instruments. MS-LS-61D provides a trip function for the Nuclear Steam Supply Shutoff System (NS4) [BD] Group 4 isolation logic (the Traversing In-Core Probe (TIP) [IG] system isolation logic). Control room personnel declared MS-LS-61D and associated instrumentation inoperable and entered Technical Specification Action statement (TSA) 3.3.2.b.2.b which requires tripping the inoperable channel within 24 hours. On January 26, 1994, with repair efforts not yet complete the channel was placed in the tripped condition. It was subsequently determined that MS-LS-61D failed during surveillance testing. MS-LS-61D was replaced, tested, and declared operable at 0238 hours on January 28, 1994.

During the review described in the Further Evaluation section of this Licensee Event Report (LER), a question was raised regarding which TSA is required for this condition, 3.3.2.b.1.b or 3.3.2.b.2.b. TSA 3.3.2.b.2.b requires that the channel be placed in the tripped condition if this does not cause an isolation (the safety function condition) with no plant shutdown required. TSA 3.3.2.b.1.b requires a plant shutdown for those channels that cause an isolation if placed in the tripped condition. However, based on a detailed review of the logic and discussions with members of the staff, it was concluded that the appropriate TSA, 3.3.2.b.2.b, was entered. The TSAs are intended to limit tripping of a channel to those instances where this action would not impact safe plant operation. Tripping the NS4 Group 4 logic does not impact plant operation. This evaluation is confirmed by a review of NUREG 1344, Standard Technical Specifications, Generic Electric Plants, BWR/6.

The correct TSA is not immediately evident. This voluntary LER is submitted for a condition that, had a detailed review and discussion with the staff not provided additional clarity, would have been reportable per the requirements of 10CFR50.73(a)(2)(i)(B) as an operation or condition prohibited by the Technical Specifications.

Immediate Corrective Action

No immediate corrective actions were required. This event was identified after MS-LS-61D was returned to an operable status.

Further Evaluation

On April 4, 1995, a reactor scram was caused by an Agastat relay [RLY, IT] failure in the non-safety-related Feedwater System/Main Turbine Trip System Actuation Instrumentation [IT] (LER 95-006-00). As a precaution, several Agastat relays were replaced in addition to the one that failed. One of these relays [RLY, BD] was part of the NS4 Group 4 TIP isolation logic.

TITLE (4)

TECHNICAL SPECIFICATION WORDING LEADS TO A POTENTIAL FOR A TECHNICAL SPECIFICATION VIOLATION

The NS4 Group 4 isolation logic was designed to be a two out of two logic (two trip channels per trip system) consistent with the majority of the NS4 design. There is a single trip system associated with the Group 4 containment isolation valves located outside containment. During a review of the isolation logic for post maintenance testing for the relay replacement it was determined that the Group 4 logic is actually one out of two, and that for one valve (TIP-V-15, the nitrogen purge to the TIP system located outside containment with a check valve located inside containment) the logic is actually one out of one. The trip contacts for each channel are comprised of one high drywell pressure trip, one low-low reactor water level trip, and one manual isolation. Tripping any of these contacts results in tripping the channel. Technical Specification Table 3.3.2-1, items 1.a.2 and 1.b (Reactor Low-Low Water Level "2" and High Drywell Pressure, respectively), requires two operable channels per trip system. The current Group 4 logic is conservative relative to the standard two out of two logic identified in the Technical Specifications since there are fewer failure modes that can prevent isolation. There is limited potential negative impact from an unplanned isolation since the TIP system is generally not in service and inadvertent closure of the isolation valves does not impact continued safe plant operation. To provide consistency, the TIP trip system will be modified to conform with standard NS4 logic. This modification will be completed during the current R10 refueling and maintenance outage.

During the April, 1995 evaluation of the TIP isolation logic, the January 25, 1994 condition and the questions regarding the TSAs discussed in the Event Description section were raised. This condition was found during a review of completed plant work documents.

Root Cause

The root cause of this event is a lack of clarity in the wording of the Technical Specification Actions statements relative to the intent of the actions.

Further Corrective Action

The "improved" Technical Specifications for WNP-2 will be submitted in the fall of 1995. This will provide additional clarification for the TSAs associated with NS4. In the interim, a Technical Specification Interpretation will be issued by May 31, 1995, to provide guidance to plant staff.

Safety Significance

Control room staff conservatively placed the inoperable channel in the tripped condition which generated a TIP isolation signal. The instrument (MS-LS-61D) was restored to an operable status at 0238 hours on January 28, 1994. Therefore, there was no safety significance associated with the January 25, 1994 event.

Similar Events

There were no past events involving the NS4 Group 4 isolation logic and the associated Technical Specification requirements.