

# CATEGORY 1

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9708250368      DOC. DATE: 97/08/18      NOTARIZED: NO      DOCKET #  
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397  
 AUTH. NAME      AUTHOR AFFILIATION  
 PFITZER, B.      Washington Public Power Supply System  
 BEMIS, P. R.      Washington Public Power Supply System  
 RECIP. NAME      RECIPIENT AFFILIATION

SUBJECT: LER 97-009-00: on 970717, discovered error in recently performed inservice testing procedure, OSP-TIP/IST-R701. Caused by procedure inadequacy. Plant procedure OSP/TIP/IST-R701 will be changed. W/970818 ltr.

DISTRIBUTION CODE: IE22T      COPIES RECEIVED: LTR 1 ENCL 1      SIZE: 4  
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

### NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD4-2 PD	1 1	COLBURN, T	1 1
INTERNAL:	ACRS	1 1	AEOD/SPD/RAB	2 2
	AEOD/SPD/RRAB	1 1	<u>FILE CENTER</u>	1 1
	NRR/DE/ECGB	1 1	NRR/DE/EELB	1 1
	NRR/DE/EMEB	1 1	NRR/DRCH/HHFB	1 1
	NRR/DRCH/HICB	1 1	NRR/DRCH/HOLB	1 1
	NRR/DRCH/HQMB	1 1	NRR/DRPM/PECB	1 1
	NRR/DSSA/SPLB	1 1	NRR/DSSA/SRXB	1 1
	RES/DET/EIB	1 1	RGN4 FILE 01	1 1
EXTERNAL:	L ST LOBBY WARD	1 1	LITCO BRYCE, J H	1 1
	NOAC POORE, W.	1 1	NOAC QUEENER, DS	1 1
	NRC PDR	1 1	NUDOCS FULL TXT	1 1

### NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL DESK (DCD) ON EXTENSION 415-2083

FULL TEXT CONVERSION REQUIRED  
 TOTAL NUMBER OF COPIES REQUIRED: LTTR 25 ENCL 25

C  
A  
T  
E  
G  
O  
R  
Y  
  
1  
  
D  
O  
C  
U  
M  
E  
N  
T

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • Richland, Washington 99352-0968

August 18, 1997  
GO2-97-159

Docket No. 50-397

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

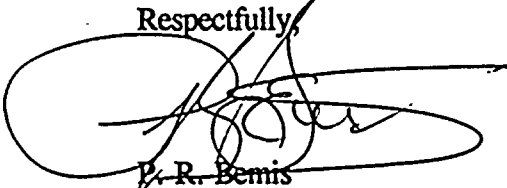
Gentlemen:

Subject: **NUCLEAR PLANT WNP-2, OPERATING LICENSE NPF-21,  
LICENSEE EVENT REPORT NO. 97-009-00**

Transmitted herewith is Licensee Event Report No. 97-009-00 for WNP-2. This report is submitted pursuant to 10 CFR 50.73 and discusses the items of reportability, corrective action taken, and action to preclude recurrence.

Should you have any questions or desire additional information regarding this matter, please call me or Mr. Paul Inserra at (509) 377-4147.

Respectfully,

  
P. R. Bemis

Vice President, Nuclear Operations  
Mail Drop PE23

050033

Enclosure

cc: EW Merschoff, NRC RIV  
KE Perkins, Jr., NRC RIV, WCFO  
TG Colburn, NRR  
PD Robinson, Winston & Strawn

NRC Sr. Resident Inspector, MD927N (2)  
INPO Records Center - Atlanta, GA  
DL Williams, BPA, MD399

9708250368 970818  
PDR ADCK 05000397  
S PDR



IE221

# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <b>Washington Nuclear Plant - Unit 2</b>	DOCKET NUMBER (2) <b>50-397</b>	PAGE (3) <b>1 OF 3</b>
---	------------------------------------	---------------------------

TITLE (4) **MISSED INSERVICE TEST FOR TIP-V 6**

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV. NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
07	17	97	97	009	00	08	18	97	N/A	05000

OPERATING MODE	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)									
POWER	90%	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)			73.71(c)
		20.405(a)(1)(ii)			50.36(c)(2)			50.73(a)(2)(vii)			OTHER
		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 <b>Bill Pfitzer, Licensing Engineer</b>	TELEPHONE NUMBER (Include Area Code) <b>509-377-2419</b>
---	---

## 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)

YES (If yes, completed EXPECTED SUBMISSION DATE).	NO	EXPECTED	MONTH	DAY	YEAR

**ABSTRACT:** On July 17, 1997, with the plant operating at 90% power, an error was discovered in the recently preformed Inservice Testing (IST) procedure, OSP-TIP/IST-R701. The procedure is to be performed each refueling outage and, among other components tested, is used to exercise the Traversing Incore Probe (TIP) purge inboard containmant isolation valve, TIP-V-6, as required by the WNP-2 IST Program Plan. The procedure allows credit to be taken for successful completion of a Local Leak Rate Test (LLRT) to demonstrate the exercise of TIP-V-6. The performers of the procedure used LLRT results for this valve from the 1996 refueling outage instead of performing a 1997 test, and the procedure was erroneously accepted as complete. As a result, TIP-V-6 was initally declared inoperable and the TIP purge outboard containment isolation valve, TIP-V-15, was closed and deactivated per Technical Specification Action Statement (TSAS) 3.6.1.3.A.1. Plant staff subsequently determined that guidance in NUREG 1482 allowed use of Generic Letter (GL) 91-18 to evaluate operability of the valve. A Followup Assessment of Operability (FAO) was performed, and consequently TIP-V-6 was declared operable and the TSAS exited. On August 12, 1997, discussions with the NRC staff revealed that a more proper course of action would have been submittal of a request for Enforcement Discretion From TSAS 3.6.1.3.A, to be followed within 48 hours by an Exigent Technical Specification Amendment Request for Technical Specification 5.5.6. Thus, TIP-V-6 was again declared inoperable and TSAS 3.6.1.3.A reentered.

The root cause of this event is procedure inadequacy. The safety significance of this event is minimal.

**LICENSEE EVENT REPORT (LER)**  
**TEXT CONTINUATION**

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Washington Nuclear Plant - Unit 2	50-397	97	009	00	2 OF 3

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Event Description

On July 17, 1997, with the plant operating at 90% power, the IST Program Lead Engineer discovered an error in the recently preformed IST procedure OSP-TIP/IST-R701. The procedure is required to be performed each refueling outage and is used to exercise the TIP [IG] purge inboard containmant isolation check valve [ISV], TIP-V-6, as required by the WNP-2 IST Program Plan. The procedure allows credit to be taken for successful completion of a LLRT to demonstrate the exercise of TIP-V-6. However, the procedure did not specify that the LLRT had to be performed during the most recent refueling outage to be acceptable. No LLRT of TIP-V-6 was required to be performed during the 1997 refueling outage. LLRT results for this valve from the 1996 refueling outage were used and the procedure was erroneously accepted as complete.

Immediate Corrective Action

Initially, immediate corrective action was taken to declare TIP-V-6 inoperable and close the TIP purge outboard containment isolation valve, TIP-V-15, within 4 hours per TSAS 3.6.1.3.A.1

Further Evaluation

After the initial conservative determination that TIP-V-6 was inoperable, plant technical personnel made the determination that guidance in NUREG 1482 "Guidelines for Inservice Testing at Nuclear Power Plants," section 7.1, "Non-conforming Conditions", allowed the use of guidance in GL 91-18 in determining operability for non-conforming conditions. As a result, an FAO was performed per GL 91-18, which demonstrated, by use of engineering judgement, that TIP-V-6 was operable. Based on the FAO, TIP-V-6 was declared operable, and TIP-V-15 was re-opened.

Subsequently, discussions between plant personnel and the staff on August 12, 1997 revealed that a more appropriate course of action would have been to request a Notice of Enforcement Discretion in lieu of applying the guidance in NUREG 1482 concerning use of GL 91-18. Consequently, TIP-V-15 was re-closed per TSAS 3.6.1.3.A.1 and a Request for Enforcement Discretion From TSAS 3.6.1.3.A was submitted to the staff, which was followed within 48 hours by an Exigent Technical Specification Amendment Request for Technical Specification 5.5.6. Enforcement Discretion was granted by the staff on August 13, 1997.

This event is being reported per 10CFR50.73(a)(2)(ii) for failure to perform the required Inservice Test as required by Technical Specification 5.5.6.

**LICENSEE EVENT REPORT (LER)**  
**TEXT CONTINUATION**

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Washington Nuclear Plant - Unit 2	50-397	97	009	00	3 OF 3

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Root Cause

The procedure, OSP-TIP/IST-R701, did not contain direction to specify that the use of LLRT data to verify TIP-V-6 exercise was acceptable only if the LLRT had been performed during the most recent refueling outage. Therefore, the cause of this event is procedure inadequacy.

Further Corrective Action

Implement requested revision to Technical Specification 5.5.6 when approved by the staff, and test TIP-V-6 at the next available opportunity.

Plant procedure, OSP-TIP/IST-R701, will be changed to clarify the need for current refueling outage LLRT data when used to verify TIP-V-6 exercise.

Assessment of Safety Consequences

During accident conditions, containment integrity is provided by closure of TIP-V-6. TIP-V-6 has demonstrated reliability through testing and inspection since 1989. Additionally, primary containment integrity will be maintained by automatic isolation of the outboard containment valve, TIP-V-15, which provides redundant isolation for this penetration. Therefore, the safety significance of this event is minimal.

Similar Events

None

