

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8708250202      DOC. DATE: 87/08/21      NOTARIZED: NO      DOCKET #  
 FACIL: STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi      05000529  
 AUTH. NAME      AUTHOR AFFILIATION  
 BRADISH, T. R.      Arizona Nuclear Power Project (formerly Arizona Public Serv  
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 RECIP. NAME      RECIPIENT AFFILIATION

SUBJECT: LER 87-012-01: on 870716, discovered that on 870102 time  
 interval for performance of Tech Spec Surveillance  
 Requirement 4.6.1.3.b.1 exceeded. Caused by error in approved  
 procedure. Procedure to be revised. W/870821 ltr.

DISTRIBUTION CODE: IE22D      COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 7  
 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

NOTES: Standardized plant. M. Davis, NRR: 1Cy.

05000529

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD5 LA	1 1	PD5 PD	1 1
	LICITRA, E	1 1	DAVIS, M	1 1
INTERNAL:	ACRS MICHELSON	1 1	ACRS MOELLER	2 2
	AEOD/DOA	1 1	AEOD/DSP/NAS	1 1
	AEOD/DSP/ROAB	2 2	AEOD/DSP/TPAB	1 1
	DEDRO	1 1	NRR/DEST/ADS	1 0
	NRR/DEST/CEB	1 1	NRR/DEST/ELB	1 1
	NRR/DEST/ICSB	1 1	NRR/DEST/MEB	1 1
	NRR/DEST/MTB	1 1	NRR/DEST/PSB	1 1
	NRR/DEST/RSB	1 1	NRR/DEST/SGB	1 1
	NRR/DLPQ/HFB	1 1	NRR/DLPQ/QAB	1 1
	NRR/DOEA/EAB	1 1	NRR/DREP/RAB	1 1
	NRR/DREP/RPB	2 2	NRR/PMAS/ILRB	1 1
	REG FILE 02	1 1	RES DEPY GI	1 1
	RES TELFORD, J	1 1	RES/DE/EIB	1 1
	RGN5 FILE 01	1 1		
EXTERNAL:	EG&G GROH, M	5 5	H ST LOBBY WARD	1 1
	LPDR	1 1	NRC PDR	1 1
	NSIC HARRIS, J	1 1	NSIC MAYS, G	1 1
NOTES:		1 1		

TOTAL NUMBER OF COPIES REQUIRED: LTTR 45 ENCL 44

## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Palo Verde Unit 2										DOCKET NUMBER (2) 0 5 0 0 0 5 2 9										PAGE (3) 1 OF 013										
TITLE (4) Late Containment Airlock Leakage Surveillance Test Due to an Error in a Procedure																														
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 NUMBER(S)																
0	1	0	2	8	7	8	7	0	1	2	0	1	0	8	2	1	8	7	Palo Verde Unit 1					0 5 0 0 0 5 2 8						
									N/A					0 5 0 0 0 1 1																
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																												
1		20.402(b)					20.406(c)					50.73(a)(2)(iv)					73.71(b)													
POWER LEVEL (10)		1 0 1 0					20.406(a)(1)(i)					50.73(a)(2)(v)					73.71(c)													
		20.406(a)(1)(ii)					50.38(c)(1)					50.73(a)(2)(vi)					OTHER (Specify in Abstract below and in Text, NRC Form 365A)													
		20.406(a)(1)(iii)					50.38(c)(2)					50.73(a)(2)(vii)																		
		20.406(a)(1)(iv)					X 50.73(a)(2)(i)					50.73(a)(2)(viii)(A)																		
		20.406(a)(1)(v)					50.73(a)(2)(ii)					50.73(a)(2)(viii)(B)																		
		20.406(a)(1)(vi)					50.73(a)(2)(iii)					50.73(a)(2)(ix)																		
LICENSEE CONTACT FOR THIS LER (12)																														
NAME															TELEPHONE NUMBER															
Thomas R. Bradish, Compliance Supervisor															6 0 2 3 9 3 - 1 3 5 3 1															
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																														
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC																				
SUPPLEMENTAL REPORT EXPECTED (14)															EXPECTED SUBMISSION DATE (15)															
YES (If yes, complete EXPECTED SUBMISSION DATE)															X NO															
															MONTH DAY YEAR															

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (18)

This is a Supplement to LER 2-87-012-00.

On July 16, 1987 it was discovered that on January 2, 1987 at 1816 MST, with Unit 2 in Mode 1 (POWER OPERATION) operating at 100 percent power, the time interval for the performance of Technical Specification (T.S.) Surveillance Requirement 4.6.1.3.b.1 (Containment Airlock Leakage Test) was exceeded.

The root cause of the event has been identified as an error in an approved procedure (TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENTS CROSS REFERENCE). This procedure did not include a reference to the fact that T.S. 4.0.2 was not applicable to T.S. 4.6.1.3.b.1.

As corrective action to prevent recurrence, the procedure will be revised to identify that no time extension will be allowed for the surveillance requirement. Additionally, a review of the T.S. will be conducted to determine if there are any other examples of T.S. surveillance requirements which do not allow the use of T.S. 4.0.2. Any examples identified will be compared to the approved surveillance test intervals to ensure that the time extensions are not being used incorrectly.

No similar events involving a late surveillance test resulting from the inappropriate use of T.S. 4.0.2 have been previously reported.

8708250202 870821  
PDR ADCK 05000529  
S PDR

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-0104

EXPIRES: 8/31/88

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Palo Verde Unit 2	0   5   0   0   0   5   2   9	8   7	—   0   1   2	—   0   1	0   2	OF	0   3

TEXT (If more space is required, use additional NRC Form 368A's) (17)

This is a Supplement to LER 2-87-012-00.

On July 16, 1987 it was discovered that on January 2, 1987 at 1816 MST, with Unit 2 in Mode 1 (POWER OPERATION) operating at 100 percent power, the time interval for the performance of Technical Specification (T.S.) Surveillance Requirement 4.6.1.3.b.1 (100 foot elevation - Containment Airlock (NH)(AL) Leakage Test) was exceeded.

The airlock leakage test is conducted in accordance with surveillance test (ST) procedure 73ST-9CL04, CONTAINMENT AIRLOCK OVERALL LEAK TEST, and is required by T.S. to be performed at least once per 6 months. This surveillance requirement is applicable during operational Modes 1-4 (POWER OPERATION thru HOT SHUTDOWN) and T.S. 4.0.2 is identified as not applicable for this specification. This means that the normally allowed extensions (1.25 times the surveillance interval or 3.25 times the surveillance interval for three consecutive intervals) cannot be utilized for this ST.

An engineer (contractor non-licensed) in the group which normally conducts /3ST-9CL04 was checking the performance intervals in preparation for an upcoming performance of the ST and identified a concern regarding surveillance interval extensions. Based on further investigation, it was determined that 73ST-9CL04 had been performed for the 100 foot elevation - containment airlock on July 2, 1986 at 1816 and was required to be completed by January 2, 1987 at 1816. Unit 2 was in Mode 1 from January 2, 1987 until a shutdown was initiated for a planned ST Outage and Mode 5 (COLD SHUTDOWN) was subsequently entered on January 11, 1987 at 0500 at which time T.S. Surveillance Requirement 4.6.1.3.b.1 was no longer applicable. 73ST-9CL04 was successfully performed on January 28, 1987 at 1330 while Unit 2 was still in Mode 5 for the Outage. Therefore, the T.S. Surveillance Requirement was exceeded by approximately 8 days - 11 hours.

The root cause of the event has been identified as an error in an approved procedure (TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENTS CROSS REFERENCE). The procedure did not include a reference to the fact that T.S. 4.0.2 was not applicable to T.S. 4.6.1.3.b.1. This resulted in 73ST-9CL04 being scheduled with an allowable 25 percent time extension. Had it been scheduled without a time extension, the ST scheduling group would have been tracking the actual performance of the ST and would have notified the performance group as the ST late date was approached.

Upon discovery of the problem, the past performance intervals for the 100 and 140 foot elevation - containment airlocks for all three operating units were reviewed to determine if they had exceeded the 6 month requirement. Two additional instances were identified in Unit 1. 73ST-9CL04 had been performed on April 4, 1985 at 1630 for both the 100 and 140 foot elevation Containment

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-0104

EXPIRES: 8/31/88

FACILITY NAME (1)  Palo Verde Unit 2	DOCKET NUMBER (2)  0 5 0 0 0 5 2 9	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 7 -	0 1 2 -	0 1	0 3	OF	0 3

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

airlocks. The 100 foot elevation airlock was successfully tested on October 8, 1985 at 1715 (approximately 3 days late) and the 140 foot elevation airlock was successfully tested on October 9, 1985 at 1320 (approximately 3 days-21 hours late). Both of these events occurred while Unit 1 was in Mode 3 (HOT STANDBY). The root cause previously described is applicable to both of these events (the procedure in use for these events was titled SURVEILLANCE TESTING).

As corrective action to prevent recurrence, the following actions will be taken for all three operating units:

- 1) Administrative Control Procedure - TECHNICAL SPECIFICATIONS SURVEILLANCE REQUIREMENTS CROSS REFERENCE will be revised to identify that no time extension will be allowed for the 6 month surveillance interval for the performance of 73ST-9CL04. Concurrently, the ST scheduling program will be revised to reflect the fact that 73ST-9CL04 will not be allowed to utilize the T.S. 4.0.2 time extensions;
- 2) A review of the T.S. will be conducted to determine if there are other examples of surveillance requirements which do not allow the use of T.S. 4.0.2. Any examples identified will be compared to the approved surveillance test intervals to ensure that the time extensions are not being used incorrectly.

73ST-9CL04 is performed to verify that the overall airlock leakage rate is within its limit to ensure that the airlock will perform its function during a design basis accident with peak containment internal pressure. In all three events, the late surveillance test was completed successfully when performed and would have been able to meet its safety function in the event of an accident. Additionally, there has never been a failure of 73ST-9CL04 when performed in Units 1, 2 and 3. Therefore, these events did not affect the safe operation of the units or the health and safety of the public.

There were no structures, systems, or components that were inoperable at the start of the event that contributed to the event. There were no unusual characteristics of the work location which contributed to the event. There were no automatic or manually initiated safety system responses. Should other concerns or information pertinent to this event be discovered, a supplement to this report will be issued.

No similar events involving a late surveillance test resulting from the inappropriate use of T.S. 4.0.2 have been previously reported.



## Arizona Nuclear Power Project

P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

192-00266-JGH/TRB/TJB

August 21, 1987

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

Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Unit 2  
Docket No. STN 50-529  
Licensee Event Report 2-87-012  
File: 87-020-404

Dear Sirs:

Attached please find Supplement No. 1 to Licensee Event Report (LER) No. 87-012-00 prepared and submitted pursuant to the requirements of 10 CFR 50.73(d). We are herewith forwarding a copy of this report to the Regional Administrator of the Region V Office.

If you have any questions, please contact T. R. Bradish, Compliance Supervisor at (602) 393-3531.

Very truly yours,

J. G. Haynes  
Vice President  
Nuclear Production

JGH/TJB/cld

Attachment

cc: O. M. DeMichele (all w/a)  
E. E. Van Brunt, Jr.  
J. B. Martin  
R. C. Sorenson  
E. A. Licitra  
A. C. Gehr  
INPO Records Center

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