LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Palo Verde Unit 1	0 5 0 0 0 5 2 8	1 OF 0 5

TITLE (4)

Missed TS 4.0.5 surveillance requirement due to personnel error

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
									Palo Verde Unit 2	0 5 0 0 0 5 2 9
1 0	2 8	9 7	9 7	- 0 0 6	- 0 0	0 2	0 5	9 8	Palo Verde Unit 3	0 5 0 0 0 5 3 0

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
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)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	below and in Text, NRC Form
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	366A)
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Daniel G. Marks, Section Leader, Nuclear Regulatory Affairs	AREA CODE 6 0 2 3 9 3 - 6 4 9 2

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS

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

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On October 28, 1997, Palo Verde Unit 2 was in Mode 3 (HOT STANDBY) when APS Engineering personnel discovered that the portions of the nuclear cooling (NC) system classified as ASME Code Class 3 had not received the periodic (3 ½ year) pressure tests for Interval 1 Periods 1 and 2 as required by Technical Specifications (TS) Limiting Condition for Operation (LCO) 3.4.9, Structural Integrity, and Surveillance Requirement (SR) 4.0.5. The omission was discovered during the performance of Unit 2's Interval 1 (10 year) ASME Section XI pressure testing. On October 28, 1997, applicable portions of Unit 2's NC system were satisfactorily pressure tested to meet the Interval 1 Period 3 requirements. On December 10, 1997, APS Engineering personnel determined that the same portions of the NC system in Units 1 and 3 had not received the Interval 1 Period 1 and 2 pressure tests as required by TS LCO 3.4.9 and TS SR 4.0.5. On December 10, 1997, applicable portions of Units 1 and 3's NC systems were satisfactorily pressure tested to meet the Interval 1 Period 3 requirements.

A preliminary evaluation has determined that the apparent root cause is attributed to personnel error. The ISI pressure testing scope for Interval 1 Periods 1 and 2 was reviewed for all three units and concluded no systems within the ISI program scope other than NC were omitted.

No previous similar events have been reported pursuant to 10CFR50.73.

TEXT

1. REPORTING REQUIREMENT:

This LER 528/97-006-00 is being written to report an operation or condition prohibited by the plant's Technical Specifications (TS) specified in 10 CFR 50.73(a)(2)(i)(B).

Specifically, on October 28, 1997, Palo Verde Unit 2 was in Mode 3 (HOT STANDBY) with the reactor coolant system (RCS) (AB) at normal operating temperature and pressure and Units 1 and 3 were in Mode 1 (POWER OPERATION) at 100 percent power, when APS Engineering personnel discovered that the portions of the nuclear cooling (NC) (CC) system classified as ASME Code Class 3 had not received the periodic (3 ½ year) pressure tests for Interval 1 Periods 1 and 2 as required by TS Limiting Condition for Operation (LCO) 3.4.9, Structural Integrity, and Surveillance Requirement (SR) 4.0.5. The omission was discovered during the performance of a review of Unit 2's Interval 1 (10 year) ASME Section XI pressure testing. On October 28, 1997, applicable portions of Unit 2's NC system were satisfactorily pressure tested (VT-2) to meet the Interval 1 Period 3 requirements.

On December 10, 1997, APS Engineering personnel conducted a review to determined if the portions of the NC system in Units 1 and 3 had received the Interval 1 Period 1 and 2 pressure tests as required by TS LCO 3.4.9 and TS SR 4.0.5 and found that the same discrepancy existed in Units 1 and 3. On December 10, 1997, applicable portions of Units 1 and 3's NC systems were satisfactorily pressure tested to meet the Interval 1 Period 3 requirements.

2. EVENT DESCRIPTION:

On October 28, 1997, APS Engineering personnel discovered that the portions of the nuclear cooling (NC) system classified as ASME Code Class 3 had not received the periodic (3 ½ year) pressure tests for Interval 1 Periods 1 and 2 as required by TS LCO 3.4.9, Structural Integrity, and TS SR 4.0.5. The omission was discovered during a scope review of Unit 2's Interval 1 (10 year) ASME Section XI pressure testing. On October 28, 1997, applicable portions of Unit 2's NC system were satisfactorily pressure tested to meet the Interval 1 Period 3 requirements.

At the time of discovery, the APS Inservice Inspection (ISI) Engineering personnel did not initiate a Condition Report/Disposition Request (CRDR) to document the deficiency until an inspection scope review and transportability review could be performed. On December 10, 1997, APS ISI Engineering personnel determined that the same portions of the NC system in Units 1 and 3 had not received the Interval 1 Period 1 and 2 pressure tests as required by TS LCO 3.4.9 and TS SR 4.0.5. On December 10, 1997,

TEXT

applicable portions of Units 1 and 3's NC systems were satisfactorily pressure tested to meet the Interval 1 Period 3 requirements.

On December 17, 1997, a CRDR was initiated to document the deficiency, to evaluate the inspection requirements, and to determine reportability. The event was determined to be reportable on January 6, 1998 when an APS ISI Engineering department leader notified Nuclear Regulatory Affairs (NRA) personnel that TS SR 4.0.5 ASME Section XI requirements for pressure testing had not been met during Interval 1 Periods 1 and 2 (January 1986 through March 1995) in Units 1, 2, and 3.

There were no safety system actuations and none were required.

3. ASSESSMENT OF THE SAFETY CONSEQUENCES AND IMPLICATIONS OF THIS EVENT:

The satisfactory performance of the Interval 1 Period 3 pressure test in Units 1, 2, and 3 on the NC system demonstrated that the structural integrity of the system had not been compromised.

The event did not result in any challenges to the fission product barriers or result in any release of radioactive materials. Therefore, there were no adverse safety consequences or implications as a result of this event. This event did not adversely affect the safe operation of the plant or health and safety of the public.

4. CAUSE OF THE EVENT:

An independent investigation of this event is being conducted in accordance with the APS Corrective Action Program. A preliminary evaluation has determined that the apparent root cause is attributed to personnel error when APS Engineering personnel (other utility personnel) failed to recognize that specific portions of the NC system were classified as ASME Code Class 3 during Interval 1 Period 1 ISI pressure testing (SALP Cause Codes: A: Personnel Error). The same omission was carried over during the performance of Period 2 ISI pressure testing. It was not until the Interval 1 (10 year) ISI, which also satisfies the Period 3 requirements, were performed that the discrepancy was discovered. The Interval 1 ISI's expanded scope includes a review of the system drawings. During the drawing review, the omission was discovered by APS ISI Engineering personnel.

TS SR 4.4.9 for Structural Integrity of ASME Code Class 1, 2, and 3 components requires TS SR 4.0.5 ISI and tests. ASME Section XI requires that pressure testing be performed for each inspection period (3 ½ years). The major portion of the NC system is not classified as ASME Code Class 3. A portion of the NC system services a train of the fuel pool heat

exchanger (FPHX) (DA). The fuel pool cooling system (DA) is necessary to provide cooling for spent fuel. The essential cooling water (EW)(BI) system design provides for manual alignment to the NC system to provide cooling water to the FPHX. This portion of the NC system interfaces with the EW system and is isolated from EW by normally closed valves. It is only this portion of the NC system that is classified as ASME Code Class 3. APS Engineering personnel may have initially missed pressure testing this portion of the NC system because they expected that the classification break would have occurred at the normally closed valves of the EW system.

No unusual characteristics of the work location (e.g., noise, heat, poor lighting) directly contributed to this event. No procedural errors contributed to this event. If the final evaluation results differ from this determination, a supplement to this report will be submitted to describe the final root cause determination.

The event was not reported within the 30 days following discovery because a CRDR was not generated to document and evaluate the discrepancy. Additionally, the CRDR, when written, was not appropriately assigned to or evaluated within APS ISI Engineering over the holiday period.

5. STRUCTURES, SYSTEMS, OR COMPONENTS INFORMATION:

There are no indications that any structures, systems, or components were inoperable at the start of the event which contributed to this event. No component or system failures were involved. No failures of components with multiple functions were involved. No failures that rendered a train of a safety system inoperable were involved.

6. CORRECTIVE ACTIONS TO PREVENT RECURRENCE:

An independent investigation of this event is being conducted in accordance with the APS Corrective Action Program. A separate evaluation addressing the failure to generate a CRDR and to complete a timely reportability evaluation is also being performed. This event has been determined to be an isolated event, not a programmatic problem. The ISI pressure testing scope for Interval 1 Periods 1 and 2 was reviewed for all three units and concluded no systems within the ISI program scope other than NC were omitted. If additional actions to prevent recurrence are developed based upon the results of the final investigation, they will be tracked to completion under the PVNGS Commitment Action Tracking System.

7. PREVIOUS SIMILAR EVENTS:

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Although previous events have been reported pursuant to 10 CFR 50.73 in the past three years for missing TS surveillance requirements, the causes discussed in the previous events have not been similar to this event. Therefore, the corrective actions of the previous events would not have prevented this event.

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TEXT *USE EIIS CODES FOR SYSTEMS AND COMPONENTS*