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EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)

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POWER AUTHORITY OF THE STATE OF NEW YORK  
JAMES A. FITZPATRICK NUCLEAR POWER PLANT

DOCKET NO. 50-333

ATTACHMENT TO LER 81-065/03L-0

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An administrative review resulted in the discovery that some surveillance testing of testable check valves in the RHR, Core Spray, HPCI and RCIC Systems had not been conducted as required by Technical Specification sections 4.5.A.1.g (Core Spray), 4.5.A.3 (RHR), 4.5.C.1 (HPCI), and 4.5.E.1.e (RCIC) during portions of 1979, 1980 and 1981.

Review of the circumstances indicates that Technical Specification Amendment 40 (issued on November 9, 1978) added the requirement to verify operability of testable check valves whenever the reactor has been in a cold condition for more than forty-eight (48) hours and the valves have not been tested within the last thirty-one days. Surveillance test procedure changes for implementation of these requirements were made. However, within a few days of the time these changes were made, additional changes were made. These additional changes incorporated certain ISI program requirements (relating to pump and valve testing) into surveillance test F-ST-2S, entitled "Valve Testing - Residual Heat Removal (ISI)", F-ST-3M, entitled "Valve Testing - Core Spray System - Cold Shutdown Only (ISI)" and F-ST-4H, entitled "HPCI Valve Testing (ISI)".

This series of procedure changes produced two (2) errors which ultimately caused the missed surveillance.

- One error omitted testing of the RCIC testable check valve entirely.
- Another error prescribed that valve testing be initiated "whenever the reactor is in the cold condition for more than forty-eight (48) hours and the valves have not been tested within the past ninety-two (92) days". This ninety-two (92) day interval requirement meets ISI Program requirements but is non-conservative with respect to the thirty-one (31) day Technical Specification requirement.

The first error resulted in test of the RCIC check valve being missed on nine (9) occasions between August 1979 and August 1981. The second error resulted in five (5) occasions on which the RHR and/or Core Spray and/or HPCI check valve was not tested (at the interval required by Technical Specification) between December 1979 and August 1981.

When the procedure error was discovered on August 14, 1981 the reactor was in the cold condition and all of the valves tests required were completed with satisfactory results prior to startup on August 16, 1981. In addition, the procedures have been corrected and a review to determine if other conflicts between Technical Specifications and the ISI Program exist did not reveal any similar problems.