



Log # TXX-93170
File # 10200
Ref. # 50.73(a)(2)(iv)

April 15, 1993

William J. Cahill, Jr.
Group Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20535

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-446
CONDITION PROHIBITED BY TECHNICAL SPECIFICATIONS
LICENSEE EVENT REPORT 93-002-00

Gentlemen:

Enclosed is Licensee Event Report 93-002-00 for Comanche Peak Steam Electric Station Unit 2, "Personnel Error Leading to Failure to Satisfy Technical Specification Surveillance Requirement for Feedwater Isolation Valve Temperature Monitoring."

Sincerely,

William J. Cahill, Jr.

NSH/bm
Attachment

c - Mr. J. L. Milhoan, Region IV
Mr. L. A. Yandell, Region IV
Resident Inspectors, CPSES (2)

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S PDR

NRC FORM 366				U.S. NUCLEAR REGULATORY COMMISSION				APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92				
LICENSEE EVENT REPORT (LER)								ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC. 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC. 20503.				
Facility Name (1) COMANCHE PEAK-UNIT 2								Docket Number (2) 05000446		Page (3) 1 of 104		
Title (4) PERSONNEL ERROR LEADING TO FAILURE TO SATISFY TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENT FOR FEEDWATER ISOLATION VALVE TEMPERATURE MONITORING												
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 Name(s)		Docket Number(s)	
03	15	93	93	002	00	04	15	93	N/A		05000446	
Operating Mode (9) 3												
This report is submitted pursuant to the requirements of 10 CFR § (Check one or more of the following) (11)												
Power Level (10) 000			20.402(b)			20.405(c)			<input checked="" type="checkbox"/> 50.73(a)(2)(iv)			
			20.405(a)(1)(i)			50.36(c)(1)			<input type="checkbox"/> 50.73(a)(2)(v)			
			20.405(a)(1)(ii)			50.36(c)(2)			<input type="checkbox"/> 50.73(a)(2)(vi)			
			20.405(a)(1)(iii)			50.73(a)(2)(i)			<input type="checkbox"/> 50.73(a)(2)(vii)(A)			
			20.405(a)(1)(iv)			50.73(a)(2)(ii)			<input type="checkbox"/> 50.73(a)(2)(vii)(B)			
			20.405(a)(1)(v)			50.73(a)(2)(iii)			<input type="checkbox"/> 50.73(a)(2)(ix)			
Licensee Contact For This LER (12)												
Name D. J. REIMER, MANAGER, SYSTEM ENGINEERING								Area Code		Telephone Number		
								817		897-5584		
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		
				N								
Supplemental Report Expected (14)										Expected Submission Date (15)	Month	
<input type="checkbox"/> Yes (If yes, complete Expected Submission Date)										<input checked="" type="checkbox"/> No		Day
											Year	
Abstract (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)												
<p>Technical Specification 3/4.7.13 requires that for MODES 1 through 4 each Main Feedwater Isolation Valve (EIS: (ISV)(SJ)) be determined to be greater than or equal to 90°F at least once per 12 hours except in MODE 1 with the Main Feedwater Isolation Valve open.</p> <p>On March 15, 1993 at 1900 CST, Auxiliary Operator (utility, non-licensed), asked the Unit 2 Unit Supervisor (utility, licensed) about the status of feedwater system (EIS: (SJ)) pressure testing and if temperature readings per OPT-102B, "Local Shiftly Surveillances", were required. After reading a note on the surveillance document, the Unit Supervisor incorrectly instructed the Auxiliary Operator that recording the temperature was not required.</p> <p>Previous and subsequent surveillance results were satisfactory. Corrective actions include revising the note to clarify it and counseling the individuals involved.</p>												

NRC FORM 366A		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92	
LICENSEE EVENT REPORT (LER) TEXT CONTINUATION				ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC. 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC. 20503.	
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Text (If more space is required, use additional NRC Form 366A's) (17)

I. DESCRIPTION OF THE REPORTABLE EVENT**A. REPORTABLE EVENT CLASSIFICATION**

Any operation or condition prohibited by the Technical Specifications.

B. PLANT OPERATING CONDITIONS PRIOR TO THE EVENT

On March 15, 1993, Comanche Peak Steam Electric Station (CPSES) Unit 2 was in MODE 3, Hot Standby.

C. STATUS OF STRUCTURES, SYSTEMS, OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

There were no inoperable structures, systems or components that contributed to the event.

D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES

Prior to licensing Unit 1 at Comanche Peak it was determined by engineering that the Feedwater Isolation Valves (FWIVs) (EIS: (ISV)(SJ)) minimum temperature at which the valve could be subjected to system pressure was 90°F. A Technical Requirements Manual Specification was written to require monitoring and logging the valve temperature every 12 hours when the system had pressure on it with the valve closed. Prior to licensing Unit 2 the requirement was converted to Technical Specification 3/4.7.13. A note is identified in the procedure for Local Shiftly Surveillances, which discusses this surveillance requirement.

On March 15, 1993, at approximately 1830 CST, shift turnover was completed. At 1900 CST on the same day, the Auxiliary Operator (utility, non-licensed) assigned to take local temperature readings, asked the Unit 2 Unit Supervisor (utility, licensed) about the status of feedwater system (EIS: (SJ)) pressure testing; if it was in progress and if temperature readings per Surveillance Test procedure OPT-102B were required. After reading a note on the OPT data sheet, the Unit Supervisor incorrectly interpreted it, and instructed the Auxiliary Operator that recording the temperature was not required.

<p>NRC FORM 366A U.S. NUCLEAR REGULATORY COMMISSION</p> <p style="text-align: center;">LICENSEE EVENT REPORT (LER) TEXT CONTINUATION</p>		<p>APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92</p> <p>ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC. 20535, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC. 20503.</p>							
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COMANCHE PEAK-UNIT 2	0500044693	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;">Year</td> <td style="width: 10%;">Sequential Number</td> <td style="width: 10%;">Revision Number</td> </tr> <tr> <td>93</td> <td>002</td> <td>00</td> </tr> </table>	Year	Sequential Number	Revision Number	93	002	00	03 OF 04
Year	Sequential Number	Revision Number							
93	002	00							
<p>Text (If more space is required, use additional NRC Form 366A's) (17)</p> <p>Technical Specification 3/4.7.13 requires that each main feedwater isolation valve shall be determined to be greater than or equal to 90°F at least once per 12 hours except in MODE 1 with the main feedwater isolation valve open. Failure to perform the required surveillance on March 15, 1993 is considered a failure to satisfy the requirement of Technical Specification 3/4.7.13. The Unit Supervisor did not verify by referencing the Technical Specification, that the surveillance was required (ie, self-checking).</p> <p>E. THE METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE, OR PROCEDURAL OR PERSONNEL ERROR</p> <p>At approximately 0700 on March 16, 1993, the oncoming shift Auxiliary Operator (utility, non-licensed) discovered that the required surveillance had not been performed by review of Surveillance Logs.</p> <p>II. COMPONENT OR SYSTEM FAILURES</p> <p>A. FAILURE MODE, MECHANISM, AND EFFECT OF EACH FAILED COMPONENT</p> <p>Not applicable - there were no component failures associated with this event.</p> <p>B. DURATION OF SAFETY SYSTEM TRAIN INOPERABILITY</p> <p>Not applicable - there was no safety related equipment rendered inoperable during or as a result of the event.</p> <p>C. SAFETY CONSEQUENCES AND IMPLICATIONS</p> <p>The temperature readings were taken shiftly on the FWIV's to ensure that the valves are not subjected to a high pressure and low temperature condition. Prior analysis indicated the possibility of brittle fracture of the valve bonnet under severe conditions. The safety significance of this event is negligible because:</p> <ul style="list-style-type: none"> a) the valve temperature had been monitored for the previous and subsequent shifts and there were no system fluctuations or transients in the reviewed periods which would have adversely affected the FWIV temperature/pressure criteria, and b) system temperature was being maintained above 90°F (117° - 132°) prior to, during and after the missed surveillance. <p>A catastrophic failure of the valve would cause a feedline break outside of containment which is analyzed and bounded by FSAR 5.2.8. It is concluded that the event did not adversely impact the safe operation of Unit 2 or the health and safety of the public.</p>									

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III. CAUSE OF THE EVENT

The cause of the event has been determined to be personnel error which resulted from incorrect interpretation of the note regarding the requirement for taking FWIV temperature in MODE 3. A contributing factor which led to this event was the translation of the Technical Specification requirement into the note of the OPT procedure which, as written, could contribute to potentially erroneous interpretation.

IV. CORRECTIVE ACTIONS**A. IMMEDIATE**

Upon discovery of the missed surveillance, an Auxiliary Operator was immediately dispatched to perform the temperature monitoring activities. The Unit Supervisor was counselled on the misinterpretation of the procedure and the requirement of the Technical Specification was reemphasized.

B. ACTION TO PREVENT RECURRENCE

Management expectations with respect to Technical Specification requirements and the need to utilize all available references when presented with questions on Technical Specification Surveillances has been reemphasized. Additionally, a procedure change was made to correct the note such that it clearly addresses the Technical Specification requirements.

V. PREVIOUS SIMILAR EVENTS

There are fifteen (15) other CPSES Licensing Event Reports (LERs) which describe previous events involving Technical Specification surveillance activities. The details of previously reported events are sufficiently different from the event described in LER 93-002-00 to include that previous corrective actions could not be expected to have prevented this event.