

Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-3195

Mailing Address:
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 868-5581

June 29, 1990

the southern electric system

W. G. Hairston, III
Senior Vice President
Nuclear Operations

ELV-01821
459

Docket No. 50-424

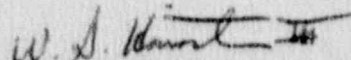
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
LICENSEE EVENT REPORT
IMPROPER APPLICATION OF GRACE PERIOD TO
CONTAINMENT AIR LOCK SURVEILLANCE

In accordance with 10 CFR 50.73, Georgia Power Company hereby submits the enclosed report related to an event which was discovered on June 1, 1990.

Sincerely,


W. G. Hairston, III

WGH,III/HWM/gm

Enclosure: LER 50-424/1990-013

xc: Georgia Power Company
Mr. C. K. McCoy
Mr. G. Bockhold, Jr.
Mr. P. D. Rushton
Mr. R. M. Odom
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebnetter, Regional Administrator
Mr. T. A. Reed, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

9007050028 900629
PDR ADDCK 05000424
S FDC

TE22
11

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)
VOGTLE ELECTRIC GENERATING PLANT - UNIT 1DOCKET NUMBER (2)
0 5 0 0 0 4 2 4 1 OF 0 3PAGE (3)
1 OF 0 3TITLE (4)
IMPROPER APPLICATION OF GRACE PERIOD TO CONTAINMENT AIR LOCK SURVEILLANCEEVENT DATE (5)
MONTH DAY YEAR
06 01 90
LER NUMBER (6)
YEAR SEQUENTIAL NUMBER REVISION NUMBER
90 - 01 3 - 00
REPORT DATE (7)
MONTH DAY YEAR
06 29 90
OTHER FACILITIES INVOLVED (8)
FACILITY NAMES
DOCKET NUMBER(S)
0 5 0 0 0 0
0 5 0 0 0 0THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)
OPERATING MODE (9) 1
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(e)(1) 50.73(a)(2)(v) 73.71(e)
20.405(a)(1)(ii) 50.36(e)(2) 50.73(a)(2)(vii) OTHER (Specify in Abstract below and in Text, NRC Form 365A)
20.405(a)(1)(iii) X 50.73(a)(2)(ii) 50.73(a)(2)(viii)(A)
20.405(a)(1)(iv) 50.73(a)(2)(i) 50.73(a)(2)(viii)(B)
20.405(a)(1)(v) 50.73(a)(2)(iii) 50.73(a)(2)(ix)LICENSEE CONTACT FOR THIS LER (12)
NAME
R. M. ODOM, NUCLEAR SAFETY AND COMPLIANCE
TELEPHONE NUMBER
AREA CODE
4 0 4 8 2 6 - 3 2 0 1COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)
CAUSE SYSTEM COMPONENT MANUFACTURER REPORTABLE TO NRC
CAUSE SYSTEM COMPONENT MANUFACTURER REPORTABLE TO NRCSUPPLEMENTAL REPORT EXPECTED (14)
YES (If yes, complete EXPECTED SUBMISSION DATE) X NO
EXPECTED SUBMISSION DATE (15)
MONTH DAY YEAR

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

On 6-1-90, a Maintenance engineer discovered that the containment air lock leakage surveillance interval had exceeded the 6 month test interval specified in Technical Specification (TS) 4.6.1.3.b on three previous occasions. On each of these occasions, a grace period had been applied to the surveillance interval; however, a footnote to TS 4.6.1.3.b indicates that the grace period provisions of TS 4.0.2 are not applicable. Therefore, the plant had operated in a condition prohibited by the Technical Specifications. No immediate action was required due to this discovery since a grace period was not currently being applied to the surveillance.

The cause of this event was cognitive personnel error involving a failure to incorporate the footnote of TS 4.6.1.3.b into the original scheduling of the containment air lock leakage surveillance. Corrective action has been taken to revise the plant surveillance tracking program to incorporate the requirements of the footnote.

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.

FACILITY NAME (1) VEGP - UNIT 1	DOCKET NUMBER (2) 0 5 0 0 0 4 2 4 9 0	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 0	0 1 3	0 0	0 2	OF	0 3

TEXT (If more space is required, use additional NRC Form 356A's) (17)

A. REQUIREMENT FOR REPORT

This report is required per 10 CFR 50.73 (a)(2)(i) because on three separate occasions, a grace period was applied to the containment air lock leakage surveillance although use of such grace period is prohibited by Technical Specification (TS) 4.6.1.3.b.

B. UNIT STATUS AT TIME OF EVENT

At the time of discovery of this event, Unit 1 was operating in Mode 1 (power operation) at 100% of rated thermal power. On each occasion that the grace period was applied to the containment air lock leakage surveillance, Unit 1 was operating in Mode 1 and remained in Mode 1 operation until after the eventual performance of the surveillance. There was no inoperable equipment which contributed to the occurrence of this event.

C. DESCRIPTION OF EVENT

TS 4.6.1.3.b requires, in part, that each containment air lock be demonstrated operable by conducting an overall air lock leakage test at least once per 6 months. A footnote is provided to indicate that the surveillance grace period provisions of TS 4.0.2 are not applicable to this surveillance. At the Vogtle Electric Generating Plant, both the containment personnel air lock and the containment escape air lock are subject to this surveillance.

On 6-1-90, a Maintenance engineer, in preparing a containment integrated leak rate test report, discovered that the containment air lock leakage surveillance had exceeded the allowable 6 month (184 day) test interval on several occasions. A 202 day test interval from 2-5-87 to 8-26-87, and a 201 day test interval from 7-31-89 to 2-17-90, was found to exist for the Unit 1 containment escape air lock. Also, a 225 day test interval from 8-18-87 to 3-30-88 was found to exist for the Unit 1 personnel air lock. No leakage test interval for the Unit 2 containment escape air lock or personnel air lock was found to exceed the allowable 6 month test interval. The surveillance tracking group was contacted and it was discovered that the grace period provisions of TS 4.0.2 had been applied on each of the above occasions when the allowable test interval was exceeded. Therefore, the plant had operated in a condition prohibited by the Technical Specifications.

No immediate action was required due to discovery of this event since the grace period provisions of TS 4.0.2 were not currently being relied upon to satisfy the requirements of TS 4.6.1.3.b.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 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)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

VEGP - UNIT 1

0 5 0 0 0 4 2 4 9 0 — 0 1 3 — 0 0 0 3 OF 0 3

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

D. CAUSE OF EVENT

The cause of the event was cognitive personnel error involving a failure to incorporate the footnote of TS 4.6.1.3.b into the original scheduling of the containment air lock leakage surveillance. The footnote of TS 4.6.1.3.b had been shown on the original master list of surveillances prepared prior to implementation of the surveillance tracking program; however, this footnote was overlooked when the scheduling of individual surveillances occurred. Since this error occurred prior to the initial startup of VEGP Unit 1 in 1987 it cannot be determined if contractor or Georgia Power personnel were responsible. There were no unusual characteristics of the work location that directly contributed to this personnel error.

E. ANALYSIS OF EVENT

On the occasions that the grace period was applied to the containment air lock leakage surveillance, the applicable air lock was found to be well within its leakage limits when the surveillance was later performed. Based on this consideration, containment integrity was not compromised by the application of the grace period and there was no adverse affect on plant safety or public health and safety as a result of this event.

F. CORRECTIVE ACTION

1. The plant surveillance tracking program has been revised to ensure that the grace period provisions of TS 4.0.2 are no longer applied to the containment air lock leakage surveillance.
2. A review of other surveillances for which application of a grace period is not allowed by the Technical Specifications, was performed and it was verified that a grace period has not been applied to those surveillances.

G. ADDITIONAL INFORMATION

1. Failed Component Identification

None

2. Previous Similar Events

None

3. Energy Industry Identification System Codes

Reactor Containment Building - NHP