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VPNPD-94-077  
NRC-94-054

August 12, 1994

Document Control Desk  
U.S. NUCLEAR REGULATORY COMMISSION  
Mail Station P1-137  
Washington, DC 20555

Ladies/Gentlemen:

DOCKET 50-301  
LICENSEE EVENT REPORT 94-002-00  
QUARTERLY TECHNICAL SPECIFICATIONS TEST  
OF PORV BLOCK VALVE NOT PERFORMED  
POINT BEACH NUCLEAR PLANT, UNIT 2

Enclosed is Licensee Event Report 94-002-00 for Point Beach Nuclear Plant, Unit 2. This report is provided in accordance with 10 CFR 50.73(a)(2)(i)(B), "The licensee shall report...any operation or condition prohibited by the plant's Technical Specifications."

This report describes the missed Technical Specifications test of pressurizer power-operated relief valve (PORV) Block Valve 2RC-516 due to an improperly reviewed temporary change to Inservice Test Procedure IT-25, "Reactor Coolant Valves (Quarterly), Unit 2," and subsequent inadequate review of the test results and testing requirements.

Please contact us if any further information is required.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Bob Link'.

Bob Link  
Vice President  
Nuclear Power

DAW/jg

cc: NRC Regional Administrator  
NRC Resident Inspector

9408170185 940812  
PDR ADBCK 05000301  
S PDR

Handwritten initials, possibly 'IEJ' or similar, with a vertical line through them.

## LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH  
THIS INFORMATION COLLECTION REQUEST: 50.0 HRS.  
FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO  
THE INFORMATION AND RECORDS MANAGEMENT BRANCH  
(MNB 7714), U.S. NUCLEAR REGULATORY COMMISSION,  
WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK  
REDUCTION PROJECT (3150-0104), OFFICE OF  
MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

## FACILITY NAME (1)

Point Beach Nuclear Plant, Unit 2

## DOCKET NUMBER (2)

05000301

## PAGE (3)

1 OF 5

## TITLE (4)

Quarterly Technical Specifications Test of PORV Block Valve Not Performed

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	DOCKET NUMBER
07	13	94	94	-- 002 --	00	08	12	94	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)						
POWER LEVEL (10)	100	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
		20.405(a)(1)(iii)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)		
		20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)		

## LICENSEE CONTACT FOR THIS LER (12)

## NAME

David A. Weaver, Senior Engineer - Licensing

## TELEPHONE NUMBER (Include Area Code)

(414) 221-3418

## 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

## SUPPLEMENTAL REPORT EXPECTED (14)

X YES (If yes, complete EXPECTED SUBMISSION DATE).		NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
				10	12	94

## ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On July 13, 1994, after preparing a temporary change to Inservice Test Procedure IT-25, "Reactor Coolant Valves (quarterly), Unit 2," Revision 11, Operations personnel discovered that a quarterly test of power-operated relief valve (PORV) Block Valve 2RC-516 was not performed during the first quarter 1994. This is contrary to Point Beach Technical Specifications Table 15.4.1-2 which requires quarterly stroke tests of PORV block valves. After further review, it was determined that inservice test Procedure IT-25, "Reactor Coolant Valves (Quarterly), Unit 2," Revision 10, had been temporarily changed on March 10, 1994, to omit the testing of PORV Block Valve 2RC-516 due to slight leakage through its associated PORV. Valve 2RC-516 was successfully tested on June 10, 1994, during its second scheduled quarterly test. A new temporary change to IT-25, Revision 11, was modified and approved on July 7, 1994, to re-instate Valve 2RC-516 test requirements. This event was caused by an improper temporary change to Inservice Test Procedure IT-25, "Reactor Coolant Valves (Quarterly), Unit 2," and subsequent inadequate screening of the test results and testing requirements.

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 INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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Point Beach Nuclear Plant, Unit 2		05000301		94	-- 002 --	00	2 OF 5

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

EVENT DESCRIPTION

On July 13, 1994, after preparing a temporary change to Inservice Test Procedure IT-25, "Reactor Coolant Valves (quarterly), Unit 2," Revision 11 dated July 6, 1994, Operations personnel discovered that the first quarter 1994 test of pressurizer power-operated relief valve (PORV) Block Valve 2RC-516 was not performed. This is contrary to Point Beach Technical Specifications Table 15.4.1-2, Item 23, which requires a quarterly stroke test for PORV block valves.

During the early morning hours of March 10, 1994, shift operating personnel prepared for the performance of Inservice Test Procedure IT-25, "Reactor Coolant Valves (Quarterly), Unit 2," Revision 10 dated January 21, 1994. Upon reviewing the procedure, the Duty Shift Superintendent (DSS) decided not to stroke test PORV Block Valve 2RC-516 because it was being maintained shut due to slight leakage through its associated PORV 2RC-430. Therefore, the DSS initiated a temporary change to IT-25, Revision 10, to delete the testing of Block Valve 2RC-516. The temporary change was subsequently approved by the Duty & Call Superintendent (DCS) on March 10, 1994, and the Manager's Supervisory Staff (MSS) on March 18, 1994, in accordance with plant administrative procedures.

After Procedure IT-25 was completed on March 10, 1994, the Operations crew forwarded the completed procedure to the Operations engineer in accordance with Point Beach Administrative Procedure PBNP 3.2.10, "Inservice Testing (Pump and Valve) Integrated Administrative Control Program at Point Beach Nuclear Plant." Purpose Statement 1.4 of Procedure IT-25 states that quarterly stroke tests of PORV Block Valves 2RC-515 and 2RC-516 are required by Technical Specifications Table 15.4.1-2, Item 23, and by ASME Boiler and Pressure Vessel Code, Section XI. When the Operations engineer noticed that Block Valve 2RC-516 was not tested due to plant conditions, the Operations engineer forwarded the information to the valve inservice test (IST) engineer for his review to determine if the test requirements were met for the block valve. The IST engineer indicated that the ASME Section XI code requirements were met because the block valve was shut and performing its safety function. Therefore, the block valve was not required to be tested. However, the Technical Specifications test requirements for Valve 2RC-516 were not verified. Operations subsequently closed-out the testing call-up for Valve 2RC-516 and Procedure IT-25.

On June 10, 1994, a different shift operating crew tested Valve 2RC-516 during its normally scheduled quarterly test (second quarter 1994). The operations crew incorrectly used the unchanged Procedure IT-25, Revision 10. The crew did not follow the temporary change to IT-25 as required.

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Valve 2RC-516 was tested successfully. On July 6, 1994, Procedure IT-25 underwent a permanent revision (Revision 11) which, by procedure, superseded all previous temporary changes. Therefore, Operations personnel drafted a new temporary change to IT-25, Revision 11, to eliminate the testing of Block Valve 2RC-516 during its next scheduled test due to the PORV leak-through. During the review and approval cycle for this temporary change, the Duty & Call Superintendent (DCS) asked if Block Valve 2RC-516 was declared inoperable and deenergized shut. The drafter investigated and responded that Block Valve 2RC-516 was being maintained shut but remained energized. The DCS requested that the Technical Specifications requirements of the valve be reviewed. Operations personnel then realized that the block valve was operable and the quarterly test should be conducted in accordance with the Technical Specifications. Operations personnel also discovered that the first quarter 1994 test for Valve 2RC-516 was not performed in accordance with Technical Specifications requirements. The temporary change to IT-25, Revision 11, was subsequently modified to place 2RC-516 testing back into effect.

EQUIPMENT DESCRIPTION

Two power-operated relief valves (PORVs) are provided for each pressurizer to limit pressure increases to less than the code safety valve set pressure. The PORVs are installed in parallel on a common header that discharges to the pressurizer relief tank. A motor-operated block valve (RC-515, RC-516) is installed upstream of each PORV and the plant is operated with the block valves normally open. However, the block valves can be closed if it becomes necessary to isolate a leaking or stuck open PORV. The pressurizer code safety valves provide the safety-related over-pressure protection function of the reactor coolant system and are sized to provide over-pressure protection without the aid of the PORVs.

The IEEE Standard 803A-1983 component identifiers for these components are:

PORV 2RC-430                      RV  
Block Valve 2RC-516 ISV

CAUSE

This event was caused by an improper review of the "Purpose" section of Inservice Test Procedure IT-25, "Reactor Coolant Valves (Quarterly), Unit 2," while originating, reviewing, and approving the temporary change. Subsequent screening of the test results and testing requirements was



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also inadequate. Proper reviews of the March 10, 1994, test results as well as the temporary procedure changes would have ensured that the proper tests were performed. There was also confusion regarding the operability of PORV 2RC-430 and Block Valve 2RC-516.

CORRECTIVE ACTIONS

## Short term:

1. The temporary change to Procedure IT-25 which was approved on July 7, 1994, was revised to leave Valve 2RC-516 testing in place as required by the Inservice Testing Program and Technical Specifications. Block Valve 2RC-516 was previously tested satisfactorily on June 10, 1994.

## Long term:

1. The Operations manager will reinforce the need for adequate reviews of the "Purpose" of tests and other procedures prior to use. This topic will be discussed with each shift operating crew by a member of the Operations staff by September 30, 1994.
2. Operations Standing Order PBNP 4.12.17, "Inservice Testing," will be revised to include a requirement for Operations office personnel to verify that the test procedure purposes have been met. This revision will be completed by October 14, 1994.
3. Root Cause Evaluation (RCE) 94-20 is being conducted on this event. Additional corrective actions will be reported after RCE 94-20 is completed via a supplemental LER by October 12, 1994.

REPORTABILITY

This event is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B), "The licensee shall report...any operation or condition prohibited by the plant's Technical Specifications." The NRC Resident Inspector was notified.

SAFETY ASSESSMENT

Block Valve 2RC-516 was tested successfully on December 11, 1993 and June 10, 1994. No maintenance was conducted on Valve 2RC-516 during that time period. Therefore, we believe Block Valve 2RC-516 was capable of performing its intended function from December 11, 1993 to June 10, 1994, and the health and safety of the plant and public were not at risk.

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GENERIC IMPLICATIONS

No generic implications have been identified.

SIMILAR OCCURRENCES

The following events involved missed Technical Specifications surveillances/tests:

<u>LER</u>	<u>Title</u>
266/88-003-00	Surveillance of 4160 Volt Safeguards Power Undervoltage Relays Not In Accordance With TS Requirements
266/93-006-00	Containment Isolation Valve Not Leak Tested In Accordance With TS Requirements