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May 31, 1991
ND3MNO:3137

Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
LER 91-014-00

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

In accordance with Appendix A, Beaver Valley Technical Specifications, the following Licensee Event Report is submitted:

LER 91-014-00, 10 CFR 50.73.a.2.i.B, "Technical Specification Surveillance Testing Deficiency".

Very truly yours,

T. P. Noonan
General Manager
Nuclear Operations

DSC/sl

Attachment

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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) Beaver Valley Power Station Unit 1										DOCKET NUMBER (2) 0 5 0 0 0 3 3 4				PAGE (3) 1 OF 0 4									
TITLE (4) Technical Specification Surveillance Testing Deficiency																							
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 NUMBER(S)										
0	5	0	2	9	1	9	1	0	1	4	0	0	0	5	3	1	9	1	0	5	0	0	0
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)																					
6		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)									
POWER LEVEL (10)		0 0 0 0				20.406(a)(1)(i)				50.73(a)(2)(iv)				73.71(c)									
		20.406(a)(1)(ii)				50.73(a)(2)(v)				50.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)									
		20.406(a)(1)(iii)				50.73(a)(2)(vi)				50.73(a)(2)(vii)(A)													
		20.406(a)(1)(iv)				50.73(a)(2)(vii)				50.73(a)(2)(viii)(B)													
		20.406(a)(1)(v)				50.73(a)(2)(viii)				50.73(a)(2)(ix)													
LICENSEE CONTACT FOR THIS LER (12)																							
NAME T.P. Noonan, General Manager Nuclear Operations										TELEPHONE NUMBER 4 1 2 6 4 3 - 1 2 5 8													
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																							
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs				
A	J	M	X	X	X	X	X	X	N														
SUPPLEMENTAL 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)																							
<p>On 5/2/91, it was discovered that Operations Surveillance Test (OST) 1.44C.1, Containment Purge And Exhaust Isolation Test, did not direct the operators to verify that a containment purge and exhaust isolation would occur on manual initiation as required by Technical Specification surveillance 4.9.9. This OST is required to be performed within 150 hours prior to the start of and at least once per sevendays during core alterations. A review of the performance history of this OST revealed that on 10/14/89, during our seventh refueling outage, core alterations were performed without proper verification of containment purge and exhaust isolation on manual initiation. In the eighth refueling outage no core alterations were performed without verification of manual initiation. However, on several occasions during the seventh and eighth refueling outages the surveillance requirements were satisfied by means other than the performance of OST 1.44C.1. Although previous revisions of this procedure required the proper verifications, a procedure revision was put into effect on 8/16/89 which inadvertently deleted the requirement to verify manual initiation. From 8/16/89 until 5/3/91, only one core alteration was performed without verifying manual initiation of the purge and exhaust isolation. The automatic isolation function was verified operable on all applicable occasions.</p>																							

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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YEAR

SEQUENTIAL
NUMBERREVISION
NUMBER

Beaver Valley Power Station Unit 1

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

DESCRIPTION of EVENT

On 5/2/91, a senior licensed reactor operator reviewed a proposed revision to Operations Surveillance Test (OST), 1.44C.1, "Containment Purge And Exhaust Isolation Test." It was noticed that the current issue and revision of this procedure (issue 2/ rev. 0) did not contain, in its acceptance criteria, the requirement to verify containment purge and exhaust isolation on manual initiation. This verification is required by Technical Specification surveillance 4.9.9. It is to be performed within 150 hours prior to the start of and at least once per seven days during core alterations.

During refueling, the purge and exhaust system is lined up to the supplementary leak collection and release system. It is designed to maintain a slightly negative containment pressure. Radiation monitors are provided for automatically isolating the purge exhaust air with the capability of manually diverting contaminated air through the main filter banks.

A review of the previous performances of this OST was initiated. The review revealed that previous revisions of this OST did contain the proper verifications. The current revision (issue 2/ rev. 0) was in effect from 8/16/89 until 5/3/91 which includes the seventh refueling outage and part of the eighth. The OST was performed several times during this period. On several occasions the surveillance requirement to verify manual isolation was satisfied by means other than the performance of the OST, for example, manually isolating the dampers for the reactor internals lift prior to the core offload. But on 10/14/89, core alterations were performed without verification of containment purge and exhaust isolation on manual initiation every seven days during core alterations as required by Technical Specification surveillance 4.9.9 and went unnoticed until this latest review.

An Operations Manual Change Notice (OMCN) was issued on 5/3/91 to reinsert the missing requirement into the acceptance criteria of the OST. In all instances the automatic isolation of these dampers was properly verified to be operable. Additionally, the dampers were verified to manually isolate prior to the 7R core offload.

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

CAUSE of EVENT

The acceptance criteria of OST 1.44C.1 was altered when the verification of manual initiation of containment purge and exhaust isolation was inadvertently removed during a procedure revision. The test's acceptance criteria was revised to clarify the requirement to verify that each input to the automatic containment isolation signal would initiate a damper closure. During this revision, the acceptance criteria to manually stroke the dampers every seven days was inadvertently omitted. The action step that manually stroked the dampers once per seven days was also inadvertently removed while modifying the step to verify correct damper stroking to a throttled position 150 hours prior to core alterations. Before the revision, the action step required manually stroking the dampers every time the test was performed. After the revision, the action step only required manually stroking the dampers for the test performance 150 hour prior to core alterations. These revision caused a missed surveillance during the seventh refueling when core alterations were performed without the proper verification being made.

CORRECTIVE ACTIONS

An Operations Manual Change Notice (OMCN) was issued on 5/3/91 to reinsert the missing verification requirement into the OST's acceptance criteria.

REPORTABILITY

This event is reportable in accordance with 19 CFR 50.73.a.2.i.B, as a condition prohibited by Technical Specifications.

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

PREVIOUS SIMILAR EVENTS

A review of Licensee Event Reports and Incident reports revealed only one other similar incident. In March 1980, it was determined that a Technical Specification required monthly check of the Auxiliary Feedwater flow instrumentation at the Remote Shutdown Panel was not being performed. This requirement was deleted from the surveillance test because the meter indication was always reading zero. There is no Auxiliary Feedwater flow during normal operations. The check was re-entered into the surveillance test. (Reference IR 1-80-17, LER 1-80-12)

SAFETY EVALUATION

There were no safety implications due to this event. The Beaver Valley Unit 1 UFSAR states that radiation monitors are provided for automatically isolating the purge and exhaust air. Although there were several other performances of this revision of the OST, the capability of manual isolation was verified through other means. In all instances the automatic isolation of these dampers was verified operable. Additionally, no problems have been noted with manually isolating these dampers when desired and there is no indication they could not have been isolated manually.