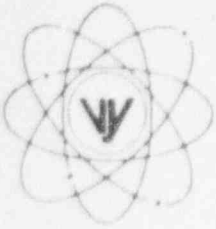


# VERMONT YANKEE NUCLEAR POWER CORPORATION



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(802) 257-7711

January 29, 1995  
BVY 95-09

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

REFERENCE: Operating License DPR-28  
Docket No. 50-271  
Reportable Occurrence No. LER 95-001

Dear Sirs:

As defined by 10 CFR 50.73, we are reporting the attached Reportable Occurrence as LER 95-001. As allowed by NUREG-1022 Chapter 5.1.1, this LER is being mailed on the following day since the 30 day limit fell on a Sunday.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

*Robert J. Wanczyk*  
Robert J. Wanczyk  
Plant Manager

cc: Regional Administrator  
USNRC  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

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PDR ADDCK 05000271  
S PDR

*LER 95-001*  
*1/1*

NRC Form 366 (5-92)		U.S. NUCLEAR REGULATORY COMMISSION			APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95 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.							
LICENSEE EVENT REPORT (LER)												
FACILITY NAME (1) VERMONT YANKEE NUCLEAR POWER STATION					DOCKET NUMBER (2) 05000271		PAGE (3) 01 OF 04					
TITLE (4) FAILURE TO PERFORM SURVEILLANCES TO ASSURE PRIMARY CONTAINMENT INTEGRITY DUE TO INADEQUATE REVIEW OF LICENSING BASIS BEFORE RELEASING EQUIPMENT FOR MAINTENANCE												
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 NO.(S)		
12	30	94	95	-- 001 --	00	01	29	95	N/A	05000		
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: CHECK ONE OR MORE (11)										
N		20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)				
POWER LEVEL (10)		20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)				
100		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  ROBERT J. WANCZYK, PLANT MANAGER								TELEPHONE NO. (Include Area Code)  802-257-7711				
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/A			-----			N/A				
		N/A			-----			N/A				
SUPPLEMENTAL REPORT EXPECTED (14)								EXPECTED SUBMISSION DATE (15)		MO	DAY	YEAR
X	YES (If yes, complete EXPECTED SUBMISSION DATE)			NO					02	28	95	

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

At approximately 1545 hours on 12/30/94, with the reactor operating at 100% power, it was identified that a required Technical Specification surveillance had not been performed prior to performing a maintenance activity on 6/11/94. Subsequent to that, two other similar failures to perform the same surveillance were identified during preparation of this LER. The other events occurred on 5/18/93 and 7/14/93.

The apparent cause of this event appears to be a lack of administrative controls to ensure Technical Specification implementation.

Immediate corrective actions were performed which included: verifying current primary containment integrity, reviewing maintenance records, establishing an interim policy requiring engineering review of work orders for safety class pressure boundary components that will be implemented when primary containment integrity is required, and issuing Nuclear Network message(s).

An LER supplement will be submitted for the root cause and, the intermediate and long term corrective actions that will be performed.

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

## DESCRIPTION OF EVENT

At approximately 1545 hours on 2/30/94, with the reactor operating at 100% power, it was identified that a required Technical Specification surveillance had not been performed prior to performing a maintenance activity on 6/11/94. Subsequent to that, two other similar failures to perform the same surveillance were identified during preparation of this LER. The other events occurred on 5/18/93 and 7/14/93.

The identification of the first event (6/11/94) occurred during engineering review of an upcoming Limited Condition for Operation (LCO) Maintenance Plan for the "A" Residual Heat Removal (RHR) system (EHS=BM). Identification of the other two events occurred on 1/23/95 during preparation of this LER.

Vermont Yankee's current design basis considers the RHR system as an extension of Primary Containment (PC). As an extension of PC, the Primary Containment Isolation Valves (PCIV) are exempt from 10CFR Part 50 Appendix J Type C testing. In order to assure PC integrity, the Plant's Technical Specifications require Type C testing if the pressure boundary of any of the three systems identified on Table 4.7.2.b will be opened when PC is required to be operable.

The first event (6/11/94) occurred when a check valve (RHR-48B) in the RHR system was opened to perform corrective maintenance and the valves bounding the opening were not Type C leak tested. After operation of the "B" RHR pump it was determined that the check valve was leaking internally and required repair. The applicable work order was reviewed and released by the on-shift Operation's Shift Supervisor (SS) prior to the necessary leak tests being performed.

The second event (7/14/93) occurred when a similar check valve (RHR-48D) in the RHR system was opened to perform a routine inspection of the internals and the valves bounding the opening were not Type C leak tested. As part of an LCO maintenance action, the internals of RHR-48D were to be inspected as required by the VY Check Valve Inspection Program. The applicable work order was reviewed and released by the on-shift Operation's SS prior to the necessary leak tests being performed.

The third event (5/18/93) occurred when the seal in the "A" RHR pump required replacement due to wear. In order to replace the seal a portion of the pump casing required disassembly. The valves bounding the opening were not Type C tested. This replacement of the seal was corrective maintenance. The applicable work order was reviewed and released by the on-shift Operation's SS prior to the necessary leak tests being performed.

## CAUSE OF EVENT

### Root Cause:

The apparent cause of this event appears to be a lack of administrative controls to ensure Technical Specification implementation.

The final root cause will be identified in the supplement to this LER.

### Contributing Causes:

The contributing cause(s) will be identified in the supplement to this LER.

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## ANALYSIS OF EVENT

Per Technical Specification 3.7.A, PC is necessary whenever the reactor coolant temperature is greater than 212 degrees F and fuel is in the reactor vessel. Primary Containment was required to be operable on 6/11/94, 5/18/93 and 7/14/93. In the three cases, all of the PCIVs for RHR were considered to be operable. Manual isolation valves, on both sides of the component being worked on were used to isolate the component from the RHR system. Isolating the component caused the associated RHR pump to be tagged out but, the other pump in the train remained operable. If a design basis Loss of Coolant Accident had occurred while the check valve was being worked on, and power was available to the operable pump in the applicable loop, the boundary valves would have been pressurized to greater than the peak containment accident pressure. Thus, a water seal would have been maintained on the boundary valves and any leakage would have been into the containment through the RHR PCIVs. The applicable Emergency Diesel Generator was operable while the valves were being worked on.

The events with the check valves are very similar, while the work performed on the seal is nearly identical to the work that was performed on the RHR pumps in 1987. In 1987, concern of potential RHR pump wear ring problems required maintenance on the pumps while Primary Containment was necessary. A one-time exemption request was granted by NRC to use the identical valves to isolate the pumps as those used during the three events.

The system was opened for approximately two days when each of the components was worked on. The following details the length of time each component was open:

WO 94-05361-00: released 6/11/94, PMT performed 6/14/94  
 WO 92-09028-00: released 5/18/93, PMT performed 5/21/93  
 WO 92-07817-00: released 7/14/93, PMT performed 7/16/93

Although this event represents a violation of Technical Specifications, the health and safety of the public were not endangered for the following reasons:

1. the PCIVs in the RHR train were operable,
2. the other RHR pump could have pressurized the loop during a DBA LOCA,
3. the open check valve flange was separated from containment by both the PCIVs and manual isolation valves, and
4. the boundary valves exhibited minimal leakage during the maintenance activities.

The Technical Specification Table (4.7.2.B) referenced by Section 4.7.A.3 lists all or portions of the following systems as extensions of PC:

- a. RHR,
- b. Standby Liquid Control system (EIS=BR), and
- c. Hydrogen Monitoring/Containment Air Monitoring (EIS=BB/IL)

## CORRECTIVE ACTIONS

### Immediate:

1. Current Primary Containment Integrity was verified.

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2. All computer records of WOs since 9/91 were reviewed for the RHR system. Two additional events were identified and are being reported with the LER.
3. An interim policy has been put into effect that requires engineering review of work orders for safety class, pressure boundary components that will be implemented with primary containment integrity is required.
4. Notices of the 6/11/94 event as well as a question to other utilities if they have a similar Technical Specification requirement were issued via Nuclear Network.

#### Short Term:

The information in this LER and management's expectations will be communicated to the operators.

Additional short term corrective actions will be identified in the following supplement.

#### Long Term:

Long term corrective actions will be identified in the following supplement.

#### ADDITIONAL INFORMATION

1. Commitments already exist for VY to:
  - a. finalize Revision 1 to the Appendix J Program, and
  - b. identify, prepare and submit any Tech Spec changes as a result of Program changes.

The VY Component Test Program provides controls to assure that the revised Program requirements are effectively included into the VY special processes and administrative procedures.

2. A supplement to this LER is expected to be submitted by 2/28/95 detailing the root cause and corrective actions.