



Log # TXX-95063  
File # 10200  
Ref. # 10CFR50.73(a)(2)(i)

March 3, 1995

C. Lance Terry  
Group Vice President

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

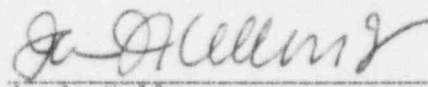
SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2  
DOCKET NO. 50-446  
CONDITIONS PROHIBITED BY THE PLANT'S TECHNICAL SPECIFICATIONS  
LICENSEE EVENT REPORT 446/95-001-00

Gentlemen:

Enclosed is Licensee Event Report (LER) 95-001-00 for Comanche Peak Steam Electric Station Unit 2, "Missed ASME Section XI Surveillance Due to Less than Adequate Work Documents".

Sincerely,

C. L. Terry

By:   
J. J. Kelley  
Vice President of Nuclear  
Engineering and Support

OB:cc  
Enclosure

cc: Mr. L. J. Callan, Region IV  
Mr. D. D. Chamberlain, Region IV  
Resident Inspectors CPSES

9503090338 950306  
PDR ADDCK 05000446  
S PDR

P. O. Box 1002 Glen Rose, Texas 76043

LE22  
111

NRC FORM 366				U.S. NUCLEAR REGULATORY COMMISSION				APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92																									
<h2 style="margin: 0;">LICENSEE EVENT REPORT (LER)</h2>								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) <b>COMANCHE PEAK-UNIT 2</b>								Docket Number (2) <b>05000446</b>		Page (3) <b>1 OF 5</b>																							
Title (4) <b>MISSED ASME SECTION XI SURVEILLANCE DUE TO LESS THAN ADEQUATE WORK DOCUMENTS</b>																																	
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 Numbers																						
02	03	95	95	001	0	03	06	95	N/A		05000446																						
This report is submitted pursuant to the requirements of 10 CFR §: (Check one or more of the following) (11) <table style="width:100%; font-size: x-small;"> <tr> <td style="width:15%;"><input type="checkbox"/> 20.402(b)</td> <td style="width:15%;"><input type="checkbox"/> 20.405(c)</td> <td style="width:15%;"><input type="checkbox"/> 50.73(a)(2)(iv)</td> <td style="width:15%;"><input type="checkbox"/> 73.71(b)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(i)</td> <td><input type="checkbox"/> 50.36(c)(1)</td> <td><input type="checkbox"/> 50.73(a)(2)(v)</td> <td><input type="checkbox"/> 73.71(c)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(ii)</td> <td><input type="checkbox"/> 50.36(c)(2)</td> <td><input type="checkbox"/> 50.73(a)(2)(vii)</td> <td rowspan="3"><input type="checkbox"/> Other (Specify in Abstract below and in Text, NRC Form 366A)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(iii)</td> <td><input checked="" type="checkbox"/> 50.73(a)(2)(i)</td> <td><input type="checkbox"/> 50.73(a)(2)(viii)(A)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(iv)</td> <td><input type="checkbox"/> 50.73(a)(2)(ii)</td> <td><input type="checkbox"/> 50.73(a)(2)(viii)(B)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(v)</td> <td><input type="checkbox"/> 50.73(a)(2)(iii)</td> <td><input type="checkbox"/> 50.73(a)(2)(x)</td> <td></td> </tr> </table>												<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> Other (Specify in Abstract below and in Text, NRC Form 366A)	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)	
<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)																														
<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)																														
<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> Other (Specify in Abstract below and in Text, NRC Form 366A)																														
<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)																															
<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)																															
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)																															
Operating Mode (9) <b>1</b> Power Level (10) <b>11010</b>																																	
Licensee Contact For This LER (12) Name: <b>R. FLORES, SHIFT OPERATIONS MANAGER</b> Area Code: <b>817</b> Telephone Number: <b>817-55910</b>																																	
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)																							
<input type="checkbox"/> Yes (if yes, complete Expected Submission Date)										<input checked="" type="checkbox"/> No																							
Abstract (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)																																	
<p>Technical Specification 4.0.5.b requires that Inservice Testing of ASME Code Class 1, 2 and 3 Pumps and valves to be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10CFR50.55a.</p> <p>On February 3, 1995, while performing a review of work documents, the Inservice Test (IST) Coordinator (utility, non-licensed) noted that the required surveillance test for Main Steam check valve 2MS-0143 (EIS:(V)(SB)) had not been performed prior to the violation date of June 16, 1994. The cause of the event was determined to be less than adequate preparation of work documents. Corrective actions included revision of the applicable work documents, and a reinforcement of expectations with cognizant individuals.</p>																																	

# 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)	Docket Number (2)	LER Number (6)			Page (3)		
COMANCHE PEAK-UNIT 2	05000446	Year	Sequential Number	Revision Number			
		95	001	00	2	OF	5

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

## I. DESCRIPTION OF REPORTABLE EVENT

### A. REPORTABLE EVENT CLASSIFICATION

Any operation prohibited by the Technical Specification (T.S.).

### B. PLANT OPERATING CONDITIONS PRIOR TO THE EVENT

At time of discovery, on February 3, 1995, Comanche Peak Steam Electric Station (CPSES) Unit 2 was in Mode 1, Power Operations.

### 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

On February 3, 1995, during package review, the Inservice Test Coordinator discovered that a portion of surveillance testing per T.S. 4.0.5 for Main Steam check valve 2MS-0143 had not been performed between February 16, 1994 and August 3, 1994. Although, monthly Technical Specification required testings had been performed on this valve, the required quarterly ASME Section XI surveillance test for the valve in the closed direction was not performed in May 1994. This surveillance was missed when the normal frequency was interrupted by the Unit 2 Mid Cycle Outage, and steam to run the Turbine Driven Auxiliary Feedwater Pump was not available.

After the Unit 2 Mid Cycle Outage, surveillance testing for the Auxiliary Feedwater System was required for valve 2MS-0143. However, the crew reviewing the surveillance work order (SWO) questioned which part or parts of the SWO were required to be performed. The SWO contains both "monthly" and "quarterly" tests for multiple components, the "monthly" tests are for the T.S. requirements whereas the "quarterly" tests are for ASME Section XI.

# 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)	Docket Number (2)	LER Number (6)			Page (3)	
COMANCHE PEAK-UNIT 2	015101010416	Year	Sequential Number	Revision Number		
		95	- 001	- 00	3	OF 5

Text (If more space is required, use additional NRC Form 368A's) (17)

The Operations Outage Duty Manager (utility, licensed) recognized that all components listed within the SWO had to be tested. Upon review of applicable testing procedure section for the AFW system, the Operations Outage Duty Manager concluded that completion of section 8.1.6 would fulfill the requirements of section 8.1.3, as the components and Technical Specifications listed in section 8.1.3 are contained in section 8.1.6. This was documented in the SWO and the test performed. However, the Operations Outage Duty Manager overlooked the fact that section 8.1.6 does not test check valve 2MS-0143 in the closed direction. Hence, the required ASME section XI surveillance which was delineated in section 8.1.3 was not performed.

## E. THE METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE, OR PROCEDURAL OR PERSONNEL ERROR

During a post-work review of work packages the IST Coordinator noted that the required surveillance for a main steam check valve was not satisfied.

## II. COMPONENT OR SYSTEM FAILURES

### A. FAILURE MODE, MECHANISM, AND EFFECTS OF EACH FAILED COMPONENT

Not applicable - there were no component failures associated with this event.

### B. DURATION OF SAFETY SYSTEM TRAIN INOPERABILITY

The subject valve was not tested for 48 days beyond its violation day, and was considered inoperable for this time period. However, the retest did not identify any degradation.

### C. SAFETY CONSEQUENCES AND IMPLICATIONS

The turbine driven auxiliary Feedwater pump (EIIS:(P)(BA)) is supplied with steam from Main Steam Lines (MSL) 1 and 4. In the event that steam generator (EIIS:(SG)(SB)) 1 was to completely depressurize, an adequate amount of steam to the Turbine Driven Auxiliary Feedwater Pump (TDAFP) could be supplied from steam generator 4. In the closed position, check valve 2MS-0143 isolated the TDAFP from the depressurized steam generator, thereby ensuring that the steam from MSL 4 does not flow to the depressurized MSL 1, bypassing the TDAFP.

# 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)	Docket Number (2)	LER Number (6)			Page (3)	
COMANCHE PEAK-UNIT 2	015101010416	Year	Sequential Number	Revision Number		
		95	- 001	- 00	4	OF 5

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

However, if the steam generator 1 is depressurizing in an uncontrolled manner, the Emergency Operating Procedures direct the reactor operators to close the steam supply valves (2MS-0101 and 2MS-0144) which are located upstream and downstream of the check valve. This instruction ensures that an adequate supply of steam to the TDAFP would be maintained, even if 2MS-0143 failed to close when appropriate. Therefore, the health and safety of the public would be unaffected by this occurrence.

## III. CAUSE OF THE EVENT

The procedure for testing the Auxiliary Feed Water components delineates both the monthly Technical Specification, and the quarterly ASME Section XI testing requirements. As written in the purpose of the procedure, both tests appear to be identical; however, the quarterly ASME Section XI test for the check valve 2MS-0143 is performed in both the open and closed positions. During recovery from the Mid Cycle Outage, Operations personnel performing the required Technical Surveillance test, which is normally performed with the valve 2MS-0143 in the open position believed that the requirements for the ASME Section XI test were also satisfied.

The cause of the event was deemed to be less than adequate information in the Surveillance Work Order. Specific information with respect to what procedure section was applicable to monthly or quarterly test was not identified on the work order. Additionally, adequate guidance was not provided by the Operations Surveillance Coordinator as to what component required the monthly or quarterly test.

## IV. CORRECTIVE ACTIONS

A review of Unit 1 surveillances for this type of surveillance was performed by the IST Coordinator, no additional matters of concerns were identified. Moreover, during this review it was noted that, the valve in question had current valid surveillance tests.

The Surveillance Work Order for Auxiliary Feed Water testing has been revised to provide clear guidance on the monthly Technical Specification surveillance and the quarterly ASME Section XI surveillance.

To preclude recurrence TU Electric is evaluating other surveillance work orders where there may have been an absence of clear guidance with respect to similar types of surveillances. Additionally, management expectations with respect to clear guidance for the testing requirements has been reemphasized.



# 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)

Docket Number (2)

LER Number (6)

Page (3)

COMANCHE PEAK-UNIT 2

0|5|0|0|0|4|4|6

Year	Sequential Number	Revision Number
9 5	-	0 0 1

5 OF 5

Text (If more space is required, use additional NRC Form 386A's) (17)

to cognizant personnel.

## V. PREVIOUS SIMILAR EVENTS

There are other CPSES Licensee Event Reports which involve incomplete/missed surveillances involving procedure deficiencies, personnel errors, or other causes. Management expectations have been identified and have been conveyed to appropriate personnel to eliminate this type event.