

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)

McGuire Nuclear Station, Unit 1

DOCKET NUMBER (2)

05000369

PAGE (3)

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TITLE (4)

Failure To Perform Technical Specifications Required Surveillances Because Testing Was Not Specified Due To The Need Not Being Recognized.

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(S)
02	27	95	94	10	1	05	11	95	Unit 2	05000370
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR. (Check one or more of the following) (11)										
OPERATING MODE (9)			20.402(b)			20.405(c)			50.73(a)(2)(iv)	
POWER LEVEL (10)			20.405(a)(1)(i)			50.36(c)(1)			50.73(a)(2)(v)	
100%			20.405(a)(1)(ii)			50.36(c)(2)			50.73(a)(2)(vii)	
			20.405(a)(1)(iii)			50.73(a)(2)(i)			50.73(a)(2)(viii)(A)	
			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)	
OTHER (Specify in Abstract below and in Text, NRC Form 366A)										

LICENSEE CONTACT FOR THIS LER (12)

NAME

Rickey J. Deese, Manager, McGuire Safety Review Group

TELEPHONE NUMBER

AREA CODE

(704)

875-4065

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS

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)

On November 30, 1994, Operations (OPS) personnel discovered that an abandoned/spare Unit 2 Containment penetration, 2-M313A, was not included in procedure PT/2/A/4200/02C, Containment Integrity Verification During Core Alterations. Investigation into the problem identified other similar abandoned/spare instrument penetrations on Units 1 and 2 which had not been included in the respective units procedure. The investigation also revealed these penetrations had not been included in procedures PT/1 and 2/A/4200/02B, Cold Shutdown Containment Integrity Verification. As a result, these abandoned/spare instrument penetrations had not been verified to be closed in accordance with Technical Specification surveillances 4.9.4.1 and 4.6.1.1a. Unit 1 was in Mode 1 (Power Operation) at 100 percent power and Unit 2 was in Mode 6 (Refueling) at 0 percent power at the time this problem was initially discovered. On February 27, 1995, it was determined that additional abandoned/spare instrument penetrations existed which had not been included in procedures PT/1 and 2/4200/02B and 02C. Both units were in Mode 1 at 100 percent power at the time. This event is assigned a cause of Required Testing Not Specified Because The Need Was Not Recognized. Inspections of the original group of abandoned/spare instrument penetrations in the Unit 1 and Unit 2 annulus on December 21 and 29, 1994, and the additional Unit 1 and 2 abandoned/spare penetrations on April 13 and April 3, 1995, respectively, identified no missing caps. These penetrations are accounted for during Integrated Leak Rate Testing and are concluded to have been closed when required. Planned corrective actions include the tack welding of the caps on abandoned/spare penetrations and surveillance of the abandoned/spare instrument penetrations until they are tack welded.

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TEXT CONTINUATION**

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**EVALUATION:****Background**

Penetration 2-M313 is a mechanical penetration [EIS: PEN] which contains multiple one-quarter inch instrument penetrations. There are 4 penetrations of this type installed in each unit. These penetrations are designated as 1 and 2-M118, M239, M313, and M402. Some of the instrument penetrations are used for instrument impulse lines, some are abandoned, and some are spares used in support of various calibrations. Additional abandoned/spare instrument penetrations exist which are not associated with mechanical penetrations 1 and 2-M118, M239, M313, and M402. Abandoned/spare instrument penetrations are capped on both ends using instrument caps.

**Description of Event**

On November 30, 1994, while preparing to perform procedure PT/2/A/4200/02C, Containment Integrity Verification During Core Alterations, Operations (OPS) personnel discovered that an abandoned/spare Unit 2 containment penetration, 2-M313A, was not included in the procedure. This problem was recognized due the familiarity of OPS personnel with the corresponding Unit 1 procedure, which included penetration 1-M313A. Penetration 2-M313A was promptly added to procedure PT/2/A/4200/02C on December 1, 1994, prior to completion of the procedure in accordance with Technical Specification (TS) surveillance 4.9.4.1.

During the investigation of this problem it was determined that there are 2 additional abandoned/spare instrument penetrations through 2-M313 and 2 more through 2-M402. There are no abandoned/spare instrument penetrations associated with penetrations 2-M118 and 2-M239. A similar arrangement exists on Unit 1, with a total of six abandoned/spare instrument penetrations (2 each) through 1-M118, 1-M313, and 1-M402.

It was subsequently determined that an additional TS surveillance, 4.6.1.1a, had been missed with regard to these abandoned/spare Unit 1 and 2 instrument penetrations, since they were not included in procedure PT/1 and 2/A/4200/02B, Cold Shutdown Containment Integrity Verification.

Unit 1 was in Mode 1 (Power Operation) at 100 percent power and Unit 2 was in Mode 6 (Refueling) at 0 percent power at the time this problem was initially discovered.

On February 27, 1995 it was determined that additional abandoned/spare instrument penetrations existed which had not been included in procedures PT/1 and 2/4200/02B and 02C. Units 1 and 2 were in Mode 1 at 100 percent power at that time. These abandoned/spare instrument penetrations are not associated with penetrations 1 and 2-M118, M239, M313, and M402.

**Conclusion**

This event is assigned a cause of required testing not specified because the need was not recognized. Surveillance of these abandoned/spare instrument penetrations has not been performed because it was not recognized that a need existed. This resulted in these abandoned/spare instrument penetrations not being included in the surveillance program. The results of the investigation indicate this condition (failure to verify the penetrations are closed) has existed since the original performance of TS surveillances 4.9.4.1 and 4.6.1.1a on each unit, with the exception that penetrations 1-M118A and 1-M313A were added to procedure PT/1/A/4200/02C on November 9, 1991. These 2 penetrations were added to PT/1/A/4200/02C because Instrument and Electrical (IAE) personnel had begun using

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them during the calibration of Containment Air Release And Addition (VQ) system [EII:BF] pressure switches [EII:PS] VQPS5000 and 5010, to establish a reference leg.

It is assumed that these abandoned/spare instrument penetrations have not been verified closed (i.e., capped) as required by TS surveillances 4.9.4.1 and 4.6.1.1a, in that they had not been included in the Containment Integrity During Core Alteration and Cold Shutdown Containment Integrity Verification procedures. However, inspection of abandoned/spare instrument penetrations associated with 1 and 2-M118, M239, M313, and M402 in the Unit 1 and Unit 2 annulus on December 21, and 29, 1994, identified no caps missing from the penetrations. Inspection of the additional abandoned/spare instrument penetrations on the Unit 1 and 2 on April 13 and April 3, 1995, respectively, identified no caps missing from the penetrations.

Measures now in place as part of the Modification process would prevent this situation from recurring. Those measures include a review by the Engineer responsible for 10 CFR 50, Appendix J, Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors, (Appendix J Engineer) of any changes to the containment boundaries during the initial review process for a modification and the Pre-implementation Notice, which provides an opportunity for review by affected groups prior to implementation of a modification.

A review of the Problem Investigation Process (PIP) database for the previous 24 months identified no reportable events due to failure to specify testing. However, an adverse trend involving missed TS surveillances has been previously identified and entered in to the PIP database. A self assessment of the TS Surveillance Testing program has been completed and corrective actions associated with the self assessment have been identified. A review is being conducted to determine if previous corrective actions are adequate.

This event is not Nuclear Plant Reliability Database (NPRDS) reportable.

There were no personnel injuries, radiation overexposures, or uncontrolled releases of radioactive material resulting from this event.

**CORRECTIVE ACTION:****Immediate:**

1. Abandoned/spare instrument penetration 2-M313A was added to procedure PT/2/A/4200/02C on December 1, 1994, prior to the start of core alterations (unloading of fuel) during 2EOC9.

**Subsequent:**

1. The additional abandoned/spare penetrations associated with 2-M313 and 2-M402 were verified closed and documented in the Unit 2 Shift Supervisor's logbook on December 21, 1994, in preparation for reloading fuel during 2EOC9.
2. The additional abandoned/spare penetrations associated with 1-M118, 1-M313, and 1-M402 were verified closed and documented in the Unit 1 Shift Supervisor's logbook on December 29, 1994, in order to comply with TS surveillance 4.6.1.1a.

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3. The caps on the abandoned/spare instrument penetrations associated with penetrations 2-M118, M239, M313, and M402 were tack welded during 2EOC9 to prevent unauthorized removal.
4. An Operability evaluation performed in association with PIP 1-M95-0246 determined that no present or past operability concerns exist regarding containment penetrations or containment integrity.
5. Abandoned/spare instrument penetrations on Units 1 and 2 were identified and the caps were verified to be in place on April 13 and April 3, 1995, respectively.
6. Tags were placed on the abandoned/spare penetrations on Units 1 and 2 to warn personnel not to remove instrument caps without contacting the Appendix J Engineer.

**Planned:**

1. Systems Engineering personnel responsible for 10 CFR 50, Appendix J will ensure that surveillance of Unit 1 and 2 abandoned/spare instrument penetrations is performed until the instrument caps are tack welded.
2. Systems Engineering personnel responsible for 10 CFR 50, Appendix J will ensure the caps on the abandoned instrument penetrations associated with penetrations 1-M118, M239, M313, and M402 are tack welded during 1EOC10.
3. Systems Engineering personnel responsible for 10 CFR 50, Appendix J will ensure the caps on the remaining abandoned/spare instrument penetrations on Unit 2 are tack welded during 2EOC10.
4. Systems Engineering personnel responsible for 10 CFR 50, Appendix J will ensure the caps on the remaining abandoned/spare instrument penetrations on Unit 1 are tack welded during 1EOC11.

**SAFETY ANALYSIS:**

This event is technically considered to be a missed surveillance since the caps on these penetrations had not been physically verified to be in place in accordance with TS surveillances 4.9.4.1 and 4.6.1.1a. Inspections of abandoned/spare instrument penetrations on December 20 and 29, 1994, and April 3 and 13, 1995, identified no missing caps from the abandoned/spare instrument penetrations.

These penetrations are also accounted for during Integrated Leak Rate Testing (ILRT). Any leakage present through the penetrations would be captured in the results from ILRTs.

Those penetrations which have been used in association with VQ system pressure switch calibrations have been removed from and returned to a capped configuration in accordance with procedure IP/O/A/3090/19A, Maintaining Containment Integrity, and are required to be pressure tested following use during these calibrations.

Based on these facts this problem is concluded to be of a technical nature only and is not considered to be significant. The health and safety of the public were not affected by this event.