



Callaway Plant

DOD

December 31, 1991

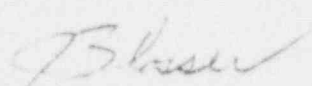
U. S. Nuclear Regulatory Commission
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ULNRC-2540

Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
FACILITY OPERATING LICENSE NPF-30
LICENSEE EVENT REPORT 91-C08-00
FAILURE TO VERIFY THAT CONTAINMENT PENETRATION
VENT VALVE WAS LOCKED CLOSED PER TECHNICAL
SPECIFICATION 4.6.1.1.a PRIOR TO 1989
DUE TO INCORRECT LOCKED VALVE LIST

The enclosed Licensee Event Report is submitted pursuant to 10CFR50.73(a)(2)(i)(B) concerning a failure to verify that a residual heat removal pump suction header vent valve had been locked closed in accordance with Technical Specification 4.6.1.1.a, prior to 3/14/89.


J. D. Blosser
Manager, Callaway Plant

JDB/TPS/MKD/lrj

Enclosure

cc: Distribution attached

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cc distribution for ULNRC-2540

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Manager, Electric Department
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Records Center
Institute of Nuclear Power Operations
Suite 1500
1100 Circle 75 Parkway
Atlanta, GA 30339

NRC Senior Resident Inspector

Mr. J. R. Hall (2 copies)
U.S. Nuclear Regulatory Commission
OWFN - Mail Stop 13E21
Washington, D.C. 20555

Supervisor Licensing
Wolf Creek Nuclear Operating Corp.
P. O. Box 411
Burlington, KS 66839

Mr. R. L. Hague
Chief, Project Section 3C
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 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) Callaway Plant Unit 1										DOCKET NUMBER (2) 0 5 0 0 0 4 1 8 3										PAGE (3) 1 OF 0 4																					
TITLE (4) FAILURE TO VERIFY THAT CONTAINMENT PENETRATION VENT VALVE WAS LOCKED CLOSED PER TECHNICAL SPECIFICATION 4.6.1.1.a PRIOR TO 1989 DUE TO INCORRECT LOCKED VALVE LIST																																									
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																							
1		2		10		9		1		9		1		0		0		8		0		0		1		2		3		1		9		1		DOCKET NUMBER(S) 0 5 0 0 0 0					
1		2		10		9		1		9		1		0		0		8		0		0		1		2		3		1		9		1		DOCKET NUMBER(S) 0 5 0 0 0 0					
OPERATING MODE (9)		1		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)																																					
POWER LEVEL (10)		100		20.402(b) 20.405(e) 50.73(a)(2)(iv) 73.71(b)																																					
				20.406(a)(1)(i) 50.38(e)(1) 50.73(a)(2)(v) 73.71(e)																																					
				20.406(a)(1)(ii) 50.38(e)(2) 50.73(a)(3)(vi) OTHER (Specify in Abstract below and in Text, NRC Form 365A)																																					
				20.406(a)(1)(iii) 50.73(a)(2)(i) 50.73(a)(2)(viii)(A)																																					
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LICENSEE CONTACT FOR THIS LER (12)																																									
NAME D. E. Young, Superintendent - Operations												TELEPHONE NUMBER 3 1 4 6 7 6 - 1 8 2 3 1																													
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																																									
CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NRC		CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NRC																							
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 12/10/91, while in Mode 1 at 100 percent power, a review of surveillance procedure OSP-GP-00001, Containment Integrity Verification, revealed that the Residual Heat Removal (RHR) pump 'A' suction header vent valve (EJV154) had not been verified as locked closed prior to 3/14/89. Technical Specification (T/S) 4.6.1.1.a requires that containment penetrations with valves located inside containment be verified during cold shutdown as locked closed.

EJV154 was not included in a 3/12/82 listing of locked containment penetration valves. This caused a RHR system drawing revision deleting the locked requirement. As this drawing was used to develop procedure OSP-GP-00001, EJV154 was not included. On 10/21/87, a utility licensed operator requested that EJV154 be designated locked closed on plant drawings for containment integrity purposes. When EJV154 was determined to require locked closed verification on 11/27/87, utility personnel reviewing this did not evaluate the applicability of T/S 4.6.1.1.a.

The crawling, valve line-up, and surveillance procedures have been revised to ensure that EJV154 is verified locked closed. No other T/S prohibited conditions were identified by the most recent utility review of containment penetrations. This is an isolated occurrence. No additional corrective actions are required.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 600 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) Callaway Plant Unit 1	DOCKET NUMBER (2) 0500048391-008-00002 OF 04	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		

TEXT (If more space is required, use additional NRC Form 306A's) (17)

BASIS FOR REPORTABILITY:

On 12/10/91, it was determined that the Residual Heat Removal (RHR) pump⁽¹⁾ 'A' suction header vent valve⁽²⁾ (EJV154) had not been verified as locked closed prior to 3/14/89. Technical Specification (T/S) 4.6.1.1.a requires penetrations that are to be closed during accident conditions be verified closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions. Penetrations with valves located inside containment are verified during each cold shutdown if they are locked, sealed or otherwise secured in the closed position. This report is submitted pursuant to 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the plant's T/S.

PLANT CONDITIONS AT TIME OF DISCOVERY:

Mode 1, Power Operations - 100 percent power.

DESCRIPTION OF EVENTS:

On 8/13/91, a non-reportable containment integrity question was identified with subsequent corrective actions. These corrective actions included an Operation's Department review of containment penetrations which are verified by T/S 4.6.1.1.a, and a list of valves that are required to be locked closed was compiled. On 12/10/91, a review of surveillance procedure OSP-GP-00001, Containment Integrity Verification, revealed that RHR suction header vent valve EJV154 (a one inch valve located inside Containment) had not been verified as locked closed prior to 3/14/89 (see attached drawing). The 'B' RHR pump suction header does not have a similar vent valve.

CAUSE:

This condition can be attributed to an incorrect listing of locked containment penetration valves developed on 3/12/82 by a procedure review group. This list did not include EJV154 as a locked valve. On 11/12/82, this incorrect list initiated an RHR system drawing revision which deleted the locked requirements. This incorrect drawing revision was later used in the original development of a plant procedure for checking the containment penetration manual valves, located inside containment, that must be verified locked closed each cold shutdown to satisfy T/S 4.6.1.1.a. When the procedure valve checklists were being prepared to satisfy the 31 day verification required by T/S 4.6.1.1.a, valves inside containment were not included because they were intended to be locked and therefore would only require surveillance during cold shutdown. On 10/21/87, during the plant's second refueling outage, a licensed shift supervisor requested an engineering request for resolution form that EJV154 be designated locked closed on plant drawings for containment integrity purposes.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 503 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-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) Callaway Plant Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 8 3 9 1	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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TEXT (If more space is required, use additional NRC Form 386A's) (17)

When EJVI54 was determined to require verification of being locked closed on 11/27/87, the utility Engineering and licensed Operations personnel reviewing this determination did not evaluate the applicability of T/S 4.6.1.1.a.

CORRECTIVE ACTIONS:

The applicable drawing and valve line-up procedure OTN-EJ-00001, Residual Heat Removal System, were revised prior to 3/30/89, to verify that EJVI54 was locked closed. On 11/12/91, surveillance procedure OSP-GP-00001 was revised to ensure that EJVI54 was verified locked closed per the requirements of T/S 4.6.1.1.a. There were no other conditions prohibited by T/S identified by the most recent utility review of containment penetrations. Personnel involved in the 1987 evaluation were reminded of their responsibility to ensure that T/S are evaluated for applicability. Since this is considered an isolated occurrence, no additional corrective actions are required.

SAFETY SIGNIFICANCE:

EJVI54 had been verified closed during initial plant startup in 1984 and in the first two plant refueling outages in 1986 and 1987. It had been verified locked closed during the following two refueling outages in 1989 and 1990. Although not verified in surveillance procedures, the blind flange downstream of vent valve EJVI54 was also installed to provide a barrier if the valve had been inadvertently opened. Since the valve was closed and blind flanged, the valve was performing its containment isolation function. Therefore, there was no effect on the public health and safety.

PREVIOUS OCCURRENCES:

None.

FOOTNOTES:

The system and component codes listed below are from IEEE Standards 805-1984 and 803A-1984, respectively.

- (1) System BP, Component P
- (2) System BP, Component VTV

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20556, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Callaway Plant Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 8 3 9 1 -	LER NUMBER (5)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		0 0 8	0 0 0	4	OF	6 4

TEXT (If more space is required, use additional NRC Form 305A's) (17)

ATTACHMENT 1

