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Southern Nuclear Operating Company
the southern electric system

March 13, 1992

10 CFR 50.73

Docket No. 50-348

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

Joseph M. Farley Nuclear Plant - Unit 1
Licensee Event Report No. LER 92-001-00

Gentlemen:

Joseph M. Farley Nuclear Plant, Unit 1, Licensee Event Report No. LER 92-001-00 is being submitted in accordance with 10 CFR 50.73. If you have any questions, please advise.

Respectfully submitted,

J. D. Woodard

JDW/EFB:map 2059

Enclosure

cc: Mr. S. D. Ebneter
Mr. G. F. Maxwell

NRC Form 366 (6-89) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104
EXPIRES: 4/30/92

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Joseph M. Farley Nuclear Plant - Unit 1	0 5 0 0 0 3 4 8	1 OF 3

TITLE (4)
Missed Surveillance on Containment Penetrations

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQ NUM	REV	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
									J. M. Farley-Unit 2	0 5 0 0 0 3 6 4
0 2	1 4	9 2	9 2	0 0 1	0 0	0 3	1 3	9 2		0 5 0 0 0

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR (11)			
		20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL	1 0 0	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	X 50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below)
		20.405(a)(1)(iii)	X 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)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER	
	AREA CODE	
D. N. Morey, General Manager - Nuclear Plant	205	899-5156

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

CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORT TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORT TO NPRDS	

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

ABSTRACT (16)

On 2-14-92, a Safety System Self Assessment (SSSA) of the Containment Isolation System identified that Farley Nuclear Plant's (FNPs) interpretation of Technical Specification (TS) 4.6.1.1.a surveillance requirements did not include a verification of all valve positions inside the required containment isolation boundary. TS 4.6.1.1.a requires all containment penetrations, not capable of being closed by operable containment automatic isolation valves and required to be closed during accident conditions, to be verified closed for containment integrity during Modes 1-4 once per 31 days. Containment penetration vent, drain, and test connection valves inside the containment isolation boundary, but outside containment, were not being verified closed accordingly. The procedure for the verification did not require a check of these valves because they were capped and seal wired in the closed position. Furthermore, four normally closed motor operated valves (MOVs) on each unit had not been deactivated in accordance with TS 4.6.1.1.a.

This event was caused by procedural error. FNP-0-STP-14.0 was revised to meet surveillance requirements by requiring all vent, drain and test connection valves and MOVs associated with containment penetrations subject to TS 4.6.1.1.a, and located outside containment, to be verified closed once per 31 days.

Both units performed verifications that confirmed all valves affected by this interpretation of TS 4.6.1.1.a were in the proper position. In addition, power was removed from the four MOVs on each unit.

Plant and System Identification

Westinghouse - Pressurized Water Reactor
Energy Industry Identification System codes are identified in the test as [XX].

Summary of Event

On 2-14-92, an SSSA of the Containment Isolation System identified that Farley Nuclear Plant's interpretation of TS 4.6.1.1.a surveillance requirements did not include verification of all valve positions inside the required containment isolation boundary. TS 4.6.1.1.a requires all containment penetrations, not capable of being closed by operable containment automatic isolation valves and required to be closed during accident conditions, to be verified closed for containment integrity during Modes 1-4 once per 31 days. Contrary to TS 4.6.1.1.a, containment penetration vent, drain, and test connection valves inside the containment isolation boundary, but outside containment, were not being verified closed every 31 days. The surveillance procedure for the verification did not require a check of these valves because they were capped and seal wired closed. Also, four normally closed MOVs on each unit had not been deactivated in accordance with TS 4.6.1.1.a

Description of Event

During the Containment Isolation System SSSA performed in February, 1992, the team raised a question regarding the adequacy of the Mode 1-4 containment verification surveillance procedure used at FNP. They maintained that containment penetration vents, drains and test connections inside the containment isolation boundary, but outside containment, were not being verified closed as required by TS 4.6.1.1.a.

System Operating Procedures (SOP) checklists for each penetration require the vent, drain and test connection valves to be capped and seal wired closed. Furthermore, any manipulation of these valves is controlled by approved plant procedures. Therefore, it was believed that periodic verification that these valves were closed was not required.

As a corrective measure, both units performed verifications that confirmed all valves affected by TS 4.6.1.1.a were in the proper position as required by the appropriate SOP checklists. In addition, power was removed from the four MOVs on each unit.

Cause of Event

This event was caused by procedural inadequacy.

Reportability Analysis and Safety Assessment

This event is reportable because surveillance required by TS 4.6.1.1.a was not performed adequately.

As a corrective measure, both units performed verifications that confirmed all applicable valves were in the proper position, therefore containment integrity was intact.

The appropriate procedures have been revised to include a verification, every 31 days, that all vent, drain, and test connection valves inside the containment isolation boundary and outside containment are closed as required by surveillance 4.6.1.1.a.

The safety significance of this event is very low for the following reasons:

1. These valves are verified closed during valve lineups after each outage;

2. These valves are verified closed following maintenance activities;

3. These valves are controlled by approved plant procedures and have low likelihood of being inadvertently mispositioned; and

4. Vent, drain, and test connection valves are capped and seal wired closed.

The health and safety of the public was not affected.

Corrective Action

FNP-0-STP-14.0, "Containment Integrity Verification Test" was revised to meet surveillance requirements by requiring all vent, drain, and test connection valves, outside containment, associated with containment penetrations subject to TS 4.6.1.1.a to be verified closed once per 31 days.

Both units performed verifications that confirmed all valves affected by this interpretation to TS 4.6.1.1.a were in the proper position as required by the appropriate SOP checklist. In addition, power was removed from the four MOVs on each unit.

Additional Information

Both units were operating at approximately 100% power on 2-14-92.

This event would not have been more severe if it had occurred under different operating conditions.