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February 6, 1992
ND3MNO:3249

Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66

LER 92-001-00

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

In accordance with Appendix A, Beaver Valley Technical Specifications, the following Licensee Event Report is submitted:

LER 92-001-00, 10 CFR 50.73.a.2.i.b, "Failure to Determine Stroke Times for Containment Isolation Valves".

Very truly yours,

T. I. Nocnan for

T. I. Nocnan
General Manager
Nuclear Operations

DSC/sl

Attachment

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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 800 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) Beaver Valley Power Station Unit 1										DOCKET NUMBER (2) 0 5 0 0 0 3 3 4 1				PAGE (3) 1 OF 5	
TITLE (4) Failure to Determine Stroke Times for Containment Isolation Valves															
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 N/A				DOCKET NUMBER(S) 0 5 0 0 0		
0 1	0 7	9 2	9 2	0 0 1		0 0	0 2	0 6	9 2					0 5 0 0 0	
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)													
1		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)	
POWER LEVEL (10)		20.405(a)(1)(i)				50.38(c)(1)				50.73(a)(2)(iv)				73.71(c)	
1 0 0		20.405(a)(1)(ii)				50.38(c)(2)				50.73(a)(2)(iv)				OTHER (Specify in Abstract below and in Text NRC Form 306A)	
		20.405(a)(1)(iii)				X 50.73(a)(2)(ii)				50.73(a)(2)(iv)(A)					
		20.405(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(iv)(B)					
		20.405(a)(1)(v)				50.73(a)(2)(ii)				50.73(a)(2)(ix)					
LICENSEE CONTACT FOR THIS LER (12)															
NAME T.P. Noonan, General Manager Nuclear Operations										TELEPHONE NUMBER 4 1 2 6 4 3 - 1 2 5 8					
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					
D	S A	X X X X	X X X X	N											
D	B K	X X X X	X X X X	N											
SUPPLEMENTAL REPORT EXPECTED (14)										EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR	
YES (If yes, complete EXPECTED SUBMISSION DATE)										X NO					

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen 30-space typewritten lines) (16)

On 12/8/91, during the performance of containment isolation valve surveillance testing, operations personnel noted that the procedure only required timing valve TV-SV-100A, Main Condenser Air Ejector Discharge to Containment, to the open position. This valve has two functions: 1) open on a high radiation condition in the main condenser and divert air ejector exhaust into the reactor containment building; 2) close on a Containment Isolation Phase "B" (CIB) signal. The operators believed the valve should also be timed closed. They immediately timed it closed and determined compliance with the Technical Specification isolation time. The ASME Inservice Test Program Coordinator was requested to determine if timing the valve both open and closed was required. On 1/7/92, The ASME Inservice Test Program Coordinator determined that the procedure should have required timing the valve in both directions. A review of other containment isolation valve testing thus far has identified one additional discrepancy. One valve did not have the closing stroke time recorded during the last outage due to a procedure error. The test procedures for both these valves will be revised. There were no safety implications due to this event. The series isolation valve for each of the involved valves were verified to have been operable during the time of the event.

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-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20545, AND TO THE PAPERWORK REDUCTION PROJECT (3155-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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TEXT (If more space is required, use additional NRC Form 365A's) (17)

DESCRIPTION OF EVENT

On 12/8/91, during the performance of Operations Surveillance Test 1.47.3B, "Three Month Containment Isolation and ASME XI Test," operations personnel noted that the procedure did not require valve TV-SV-100A, Main Condenser Air Ejector Discharge to Containment, to be stroke timed to the closed position. This valve has two functions. One function is to open on a high radiation condition in the main condenser to divert air ejector exhaust from its normal atmospheric release path to the reactor containment building. The other function is to close on a Containment Isolation Phase "B" (CIB) signal. The surveillance test required timing the opening function of the valve but not its closing. Operations believed the valve should also be timed closed, since it was a containment isolation valve. Therefore, the operators timed the closing stroke at 10.18 seconds. This is well within the Technical Specification maximum stroke time of 20 seconds. Operations transmitted this data to the ASME program coordinator and requested the coordinator determine if timing the valve closed was required. On 1/7/92, the ASME program coordinator determined that timing the closing of TV-SV-100A was required by the ASME Section XI Inservice Test Program and the unit Technical Specifications.

A review has been initiated of all the containment isolation valves at both BVPS Units 1 and 2 to determine if the existing surveillance programs meet all technical specification ASME requirements. To date, this review has identified one additional deficiency. The Containment Recirculation Cooling Coil Component Cooling Water isolation valve (TV-CC-110F1) stroke time was not recorded during the surveillance in the previous refueling outage (mid-1991). A review of the test data showed that TV-CC-110F1 had been stroke timed during all previous refueling outages and had been stroke timed satisfactorily during a maintenance outage in November 1991.

CAUSE OF EVENT

Both missed surveillances were caused by procedural deficiencies. Due to an oversight in developing the original surveillance test procedure the requirement to stroke time TV-SV-100A in the closed direction was never identified.

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 (F-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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

The procedure for testing TV-CC-110F1 was revised in April 1991. TV-CC-110F1 was no longer required by the ASME program to be stroke timed due to its passive action. The procedure data table was revised to delete (place an "NA" in the data table block) the requirement to record ASME stroke times. During this revision, an "NA" was inadvertently inserted in the block for recording the technical specification required stroke time as well.

CORRECTIVE ACTIONS

The following corrective actions have been or will be taken as a result of this event:

1. Operations Surveillance Test 1.47.3A, "Three Month Containment Isolation and ASME XI Test" and Operations Surveillance Test 1.47.3B, "Refueling Containment Isolation and ASME XI Test" are being revised to include the required testing for both TV-SV-100A and TV-CC-110F1.
2. The ASME section XI Inservice Test Program is being revised to require timing TV-SV-100A closed.
3. Additional review of the other containment isolation valves on both units has been initiated to verify that surveillance testing satisfies the requirements of Technical Specification 4.0.5 and applicable ASME requirements. If additional deficiencies are identified, they will be documented in a supplemental report.
4. A review of Technical Specification surveillance procedures developed to address ASME Section XI program valves will be conducted by the Independent Safety Evaluation Group in order to determine that procedures address the applicable surveillance requirements.
5. The Onsite Safety Committee will direct a review of the procedure approval and procedure change process with regards to changes made to surveillance testing procedures.

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.

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Beaver Valley Power Station Unit 1

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

REPORTABILITY

This report is being submitted in accordance with 10CFR 50.73 (a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications. Technical Specification 4.6.3.1.2 requires each containment isolation valve to be stroke timed to its isolation position. Additionally, Technical Specification Surveillance Requirement 4.0.5 requires that ASME Code Class 1, 2, and 3 pumps and valves be tested in accordance with Section XI of the ASME Boiler and Pressure Vessel Code.

Article IWV-3000 of the above code requires that valves be exercised to the position to fulfill their function every three months. The closing function of TV-SV-100A had not been determined to meet ASME code requirements until 12/8/91.

SAFETY IMPLICATIONS

There were no safety implications due to this event. A review of leak testing history showed that check valve AS-278, the series isolation valve for TV-SV-100A, had been fully operable since initial construction and capable of isolating its containment penetration in the event of an accident. When this current testing deficiency was first suspected, it was immediately determined that the closing time of TV-SV-100A was within the Technical Specification required stroke time. Additionally, the opening stroke times for TV-SV-100A for the last five years were reviewed. The opening stroke time has been slowly increasing during this period and is currently longer than any previous stroke time in that period. This evidence that the valve is stroking slower, combined with a current closing stroke time which is less than the Technical Specification requirement, provides a high level of confidence that valve's closing stroke time during this period was within its accident analysis assumed time.

The stroke time and leak test data from the last refueling outage for TV-CC-110D, the series isolation valve for TV-CC-110F1, was reviewed and verified to be satisfactory. Based on this data, TV-CC-110D was fully capable of isolating its containment penetration in the event that TV-CC-110F1 failed. The stroke times for TV-CC-110F1 before and after this event were reviewed and verified to be satisfactory.

LICENSEE EVENT REPORT (LER)
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

SIMILAR EVENTS

A review of station documents revealed previous similar events where procedural deficiencies resulted in missed or deficient surveillances. Examples include the following:

1. Unit 1 LER 91-009, Failure to Perform Hydrostatic Testing
2. Unit 1 LER 91-014, Failure to Perform Containment Purge Testing
3. Unit 1 LER 91-030, Inadequate Main Filter Bank Testing