VERMONT YANKEE
NUCLEAR POWER CORPORATION

P.O. Box 157, Governor Hunt Road
Vernon, Vermont 05354-0157
(802) 257-7711

November 30, 1995
BVY 95-129

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

References: Operating License DPR-28
Docket No. 50-271
Reportable Occurrence No. LER 95-017 Supp. 1

Dear Sir:

As defined by 10 CFR 50.73, we are reporting the attached Reportable Occurrence as LER 95-017, Supplement 1.

Very truly yours,

Robert J. Wanczyk

Robert J. Wanczyk
Plant Manager

RJW/dm
cc: Regional Administrator
USNRC
Region I
475 Allendale Road
King of Prussia, PA 19406

IE22

NRC Form 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER ( )	PAGE (3)
VERMONT YANKEE NUCLEAR POWER STATION	05000271	01 OF 04

TITLE (4) Technical Specification 4.6.E Not Met Due to Components Not Included in the Inservice Test Program Scope

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 NO.(S) 05000
09	22	95	95	-- 17 --	01	11	30	95	N/A	N/A

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: CHECK ONE OR MORE (11)							
POWER LEVEL (10)	100		20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)
			20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)
			20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71
			20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER
			20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		(Specify in Abstract below or in NRC Form 366A)
			20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NO. (Include Area Code)
ROBERT J. WANCZYK, PLANT MANAGER	802-257-7711

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/A					N/A				
N/A					N/A				

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

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

During a review of the Vermont Yankee Inservice Test Program, questions arose regarding the basis for not including SR-13-25 (RCIC pump suction relief valve) and SR-23-34 (HPCI pump suction relief valve) in the IST program. Upon subsequent review, it was determined that SR-23-34 and SR-13-25 have a safety function to protect HPCI and RCIC pump suction pipework from overpressurization and should have been included within the scope of the IST program. As a result of this inquiry, a larger scope of valves with similar functions was subsequently reviewed for applicability. This subsequent review determined that SR-10-72A, SR-10-72B, SR-10-72C and SR-10-72D (Residual Heat Removal Pump Suction Relief Valves) also were not included within the scope of the IST Program. Additionally, during further review of components in the High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) systems, FCV-23-42, FCV-23-43, LCV-23-53, FCV-13-34, FCV-13-35 and LCV-13-32 (HPCI and RCIC Steam Line Condensate Pot Isolation and Level Control Valves) were identified as not being included in the IST program. These valves have safety functions to support the operation of the HPCI and RCIC systems. Since these valves were not included in the Vermont Yankee IST Program scope, the requirements of Technical Specification Surveillance Requirement 4.6.E were not met. An extension past the 30 day report date for revision 00 of this LER was granted by the Resident Inspector. It was determined that the cause of this event was due to an inadequate technical review performed during the 1993 program update. A Basis for Maintaining Operation was prepared and determined that the plant will continue to operate safely even though the subject valves were not tested in the Vermont Yankee IST program.

DESCRIPTION OF EVENT

On 09/22/95 with the plant operating at 100% power, questions arose during a review of the Vermont Yankee Inservice Test Program regarding the basis for not including SR-13-25 (RCIC pump suction relief valve) and SR-23-34 (HPCI pump suction relief valve) in the IST program. It was determined that SR-23-34 and SR-13-25 have a safety function to protect HPCI and RCIC pump suction pipework from overpressurization. The HPCI and RCIC pump suction pipework are required to mitigate the consequences of an accident.

As a result of this inquiry, a larger scope of valves was reviewed for applicability. This review determined that SR-10-72A, SR-10-72B, SR-10-72C and SR-10-72D (Residual Heat Removal Pump Suction Relief Valves) also were not tested in the VY IST Program. These valves function to protect the RHR pump suction pipework from overpressurization. The RHR pump suction pipework is required to mitigate the consequences of an accident.

Additionally, during further review of components in the High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) systems, FCV-23-42, FCV-23-43, LCV-23-53, FCV-13-34, FCV-13-35 and LCV-13-32 (HPCI and RCIC Steam Line Condensate Pot Isolation and Level Control Valves) were identified as not being included in the IST program. These valves have safety functions to support the operation of the HPCI and RCIC systems.

ANALYSIS OF EVENT

Section 4.6.E of the Vermont Yankee Technical Specifications specifies that inservice testing (IST) of safety related pumps and valves be performed in accordance with Section XI of ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a, except where specific written relief has been granted by the NRC Pursuant to 10 CFR 50, Section 50.55a. Vermont Yankee adopted the 1990 Edition of Section XI during its required third interval update in 1993. Subsections IWV and IWP of ASME Section XI reference the use of the ASME Operations and Maintenance (OM) Standards through the 1988 addenda (OMa-1988) for the testing requirements of pumps and valves. OMa-1988 Part 10 "Inservice Testing of Valves in Light-Water Reactor Power Plants" specifies in subsection 1.1 that "The pressure relief devices covered are those for protecting systems or portions of systems which perform a required function in shutting down a reactor to the cold shutdown condition, in maintaining the cold shutdown condition, or in mitigating the consequences of an accident." Additionally, subsection 1.1 also states that "The active or passive valves covered are those which are required to perform a specific function in shutting down a reactor to the cold shutdown condition, in maintaining the cold shutdown condition, or in mitigating the consequences of an accident."

SR-13-25 (RCIC pump suction relief valve), SR-23-34 (HPCI pump suction relief valve), SR-10-72A, SR-10-72B, SR-10-72C and SR-10-72D (RHR pump suction relief valve(s)) protect portions of the RCIC, HPCI and RHR systems which perform a function in mitigating the consequences of an accident. FCV-23-42, FCV-23-43, LCV-23-53, FCV-13-34, FCV-13-35 and LCV-13-32 (HPCI and RCIC Steam Line Condensate Pot Isolation and Level Control Valves) have active functions to support the operation of the HPCI and RCIC systems which perform a function in mitigating the consequences of an accident.

Since these valves were not included in the Vermont Yankee IST program, the requirements of Vermont Yankee Technical Specification Requirement 4.6.E for these valves were not met.

A Basis for Maintaining Operation (BMO) was prepared and determined that the plant will continue to operate safely even though the subject valves were not tested in the Vermont Yankee IST program. It was determined in the BMO for the RHR, RCIC and HPCI relief valves that overpressurization of the RHR, HPCI and RCIC pipework was unlikely due to the limited sources of high pressure fluids and due to the administrative controls which prevent suction pipework isolation valves from being placed in the closed condition. Additionally, it was determined that the HPCI and RCIC Turbine Steam Line Drain Isolation

and Level Control Valves would perform as required since their performance is monitored during period surveillance testing of the HPCI and RCIC pumps. Therefore, at no time as a result of these IST program deficiencies were the health and safety of the public affected.

CAUSE OF EVENT

Root Cause:

Vermont Yankee has determined that the reason for not including the subject valves in the IST program was due to an inadequate technical review during a program update in 1993.

Contributing Causes:

1. The IST program basis document which was used as an aid in determining IST program scope received no formal review nor was it maintained up to date during subsequent IST program revisions.

2. Management oversight of IST program activities was ineffective.

3. IST program responsibilities are fragmented and decentralized.

CORRECTIVE ACTIONS

Short Term:

1. As a result of the identified program scope deficiencies an operability assessment was performed for the subject systems. This assessment concluded that the plant could continue to operate safely until the corrective actions were completed.

2. Vermont Yankee will perform a comprehensive review of the IST program scope to verify compliance with ASME/ANSI OMa-1988 Parts 1, 6 and 10. This action is expected to be completed by 12/31/95.

3. A re-organization of the Vermont Yankee Engineering Department is currently in progress. As part of this re-organization, Vermont Yankee is assuring that engineering program coordination and program oversight are appropriately defined. This action is expected to be completed by 12/31/95.

4. Vermont Yankee will add FCV-23-42, FCV-23-43, LCV-23-53, FCV-13-34, FCV-13-35 and LCV-13-32 (HPCI and RCIC Steam Line Condensate Pot Isolation and Level Control Valves) to the IST program and begin testing in accordance with the requirements of the Code. This action is expected to be completed by 12/31/95.

Long Term:

1. Vermont Yankee will upgrade the existing IST program basis document to describe the methodology used for preparing the IST program, to provide a basis for including components in the IST program or excluding components from the IST program and to define the basis for the testing applied to each component. This action is expected to be completed by 10/01/96.

2. Vermont Yankee will add SR-13-25, SR-23-34, SR-10-72A, SR-10-72B SR-10-72C and SR-10-72D (RCIC, HPCI and

RHR pump suction relief valves) to the IST program and begin testing in accordance with the requirements of the code. This action is expected to be completed prior to the end of the 1996 refueling outage.

ADDITIONAL INFORMATION

No similar events regarding IST program scope deficiencies have been reported to the Commission in the past five years. This event was identified by the NRC as a violation of the requirements of 10 CFR 50.55a in Inspection Report 95-21 dated 10/20/95. Vermont Yankee responded to this violation by letter (BVY 95-124) dated 11/16/95.