

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Washington Nuclear Plant - Unit 2										DOCKET NUMBER (2) 0 5 0 0 0 3 9 1 7 1 OF 0 4										PAGE (3) 1 OF 0 4			
TITLE (4) Technical Specification Valve Closing Times Not Met																							
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					DOCKET NUMBER(S)									
0	9	1	9	8	4	8	4	1	0	0	0	1	1	1	2	1	8	4	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)																				
POWER LEVEL (10)			20.402(b)				20.406(a)				50.73(a)(2)(iv)				73.71(b)								
0 5 5			20.406(a)(1)(i)				50.38(e)(1)				50.73(a)(2)(v)				73.71(c)								
			20.406(a)(1)(ii)				50.38(e)(2)				50.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 365A)								
			20.406(a)(1)(iii)				<input checked="" type="checkbox"/> 50.73(a)(2)(i)				50.73(a)(2)(viii)(A)												
			20.406(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)												
			20.406(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(ix)												
LICENSEE CONTACT FOR THIS LER (12)																			TELEPHONE NUMBER				
NAME														AREA CODE									
R. L. Koenigs, Compliance Engineer														5101931771-1251011									
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																			Ext. 2279				
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC													
A	AD - IIS IV	B131510		N																			
SUPPLEMENTAL REPORT EXPECTED (14)														EXPECTED SUBMISSION DATE (15)					MONTH DAY YEAR				
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)														<input checked="" type="checkbox"/> NO									

ABSTRACT Limit to 400 (space) - e. space - etc. - fifteen single-space typewritten lines (16)

Following an apparent failure of two isolation valves to meet the closing time criteria of a surveillance test, previous surveillance tests of these isolation valves were reviewed. It was found that the closing time criteria was not satisfied or noted as unacceptable on one previous test. At the time of discovery, recent changes to Plant Technical Specifications made the observed values acceptable.

Further review identified six additional surveillance procedures which had not been performed in accordance with Technical Specification time requirements.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/85

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TEXT (If more space is required, use additional NRC Form 386A's) (17)

Plant Conditions

- a) Power Level - 55%
- b) Plant Mode - 1

Event

Two Reactor Recirculation (RRC) system primary containment valves (RRC-V-16A and RRC-V-16B, control rod drive seal purge to RRC pumps) failed to meet the specified maximum closing time during a 9/11/84 surveillance test.

This generated a review of the Technical Specification (T.S.) requirements and previous test data. The following observations were made during this review.

- o The Technical Specification was changed by an August 1984 ammendment such that observed closing times were now acceptable.
- o This surveillance test had been previously performed on 6/6/84 and the valves also failed to meet specified closing times. The surveillance procedure review cycle did not note this failure, Plant operation continued without any corrective action being taken and RRC-V-16A and -16B were not declared inoperable. This was technically not in compliance with Technical Specifications. However, the valves were functional during the entire period and met the amended T.S. 3.6.3 closing time requirement.

Immediate Corrective Action

A procedure deviation was processed to bring the acceptance criteria of surveillance procedure 7.4.0.5.9 into agreement with T.S. Table 3.6.3-1.

Further Corrective Action

A further review of available data revealed:

- o These particular valves had not been tested during the period of time from 12/25/83 to 6/5/84. The reason for this is twofold. 1) In November, 1983, Plant personnel identified the absence of RRC-V-16A and -16B from surveillance procedure 7.4.0.5.9. A procedure revision was initiated at that time and incorporated on 2/9/84. This was after the surveillance was performed on 1/27/84. 2) In June of 1984 it was discovered that the Scheduled Maintenance System (SMS) did not automatically schedule performance of cold shutdown surveillances for the Operations Department. Thus procedure 7.4.0.5.9, which is required to be done on a quarterly basis in cold shutdown, was not performed between 1/27/84 and 6/6/84.

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TEXT (If more space is required, use additional NRC Form 386A's) (17)

The June SMS review identified a total of 6 additional surveillance procedures which were not being scheduled for performance by SMS during cold shutdown (CSD) conditions. This was in violation of T.S. 4.0.5. These surveillance procedures were immediately performed and satisfactory results obtained. SMS was modified and these surveillances are all now scheduled for quarterly performance, identified as requiring cold shutdown and are tracked until completion. These surveillances are not required on a rigid 90 day, or quarterly, basis. ASME code specifies that 1) when the duration between CSD periods exceeds 3 months, the valves are to be stroked when the next CSD period is attained, and 2) when the interval between CSD periods is less than 3 months, no full stroke valve tests are required.

It has been verified that all valves listed in T.S. Table 3.6.3-1 are included in Plant procedures such that surveillance test requirements are identified by plant surveillance procedures. As stated above, these procedures are currently being scheduled on a quarterly basis. In addition, PPM 1.5.1 will be changed to indicate how the CSD frequency surveillance requirements are being evaluated for performance. PPM 3.2.1, Normal Shutdown to Cold Shutdown, has been changed such that each CSD identified surveillance is evaluated for current completion status during the shutdown process.

When the SMS scheduling of CSD surveillances was modified in June, it was not recognized that any surveillance had been missed, no record search was conducted at that time. Thus no LER report was generated at that time.

In November, 1983, when RRC-V-16A and -16B were identified as missing from the surveillance procedure, WNP-2 had not yet received its operating license. There was no need for an immediate procedure change and primary containment integrity was not required until the week of April 10, 1984. The current system for procedure deviations and revisions is judged adequate to preclude having long time delays in the revision process leading to non-compliance with T.S. surveillance requirements. Plant personnel associated with surveillance procedures are aware that procedure "deviations" are processed with minimal delay and should be used in situations such as this.

- o It was also noted that the August 1984 T.S. amendment was initiated in January, 1984. This provided for new closing time requirements for RRC-V-16A and -16B, since they could not meet existing closure requirements. Operations personnel did not recognize this hardware limitation and thus did not take the T.S. required corrective action.

The Plant now has a position of Compliance Engineer. One function of this position is to review T.S. change requests for impact on Plant operations such that this breakdown in communication should not occur in the future.

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TEXT (If more space is required, use additional NRC Form 388A's) (17)

- o A further review of procedure 7.4.0.5.9 noted that the closing time requirement for RRC-V-16A and -16B were not identified as T.S. limits. Upon issuance of the August 1984 T.S. ammendment, procedure 7.4.0.5.9 was evaluated for effect. 7.4.0.5.9 was judged to require no change since it was thought that the procedure closing time requirement for RRC-V-16A and -16B was based on a more stringent ASME requirement. A notation will be included in 7.4.0.5.9 indicating that these times are T.S. limits.
- o A letter was issued to all Department Managers which reinforces the legal requirements associated with T.S. surveillance procedure performance.

Safety Significance

ANSI N271-1976, Containment Isolation Provisions for Fluid Systems, which is referenced by Regulatory Guide 1.141, states that for valves 3" in diameter or less, valve closure times provided by standard commercial valve operators are adequate to limit radioactivity release from the containment. The rationale behind this statement is that the release of contaminants from failed fuel, post-LOCA, does not occur mechanistically until something on the order of one minute. RRC-V-16A and -16B are 3/4" gate valves and were operational during the entire period with closing times well below the currently allowed 15 seconds.

The remaining five procedures which were not being scheduled for cold shutdown by SMS identified applicable CSD testing for various valves. The valves in these procedures were tested, as a minimum, in the Dec. 83/Jan. 84 time period and in June of 1984. The closing times, in all cases, were acceptable initially and again in June. It can therefore be concluded that these valves were operating within T.S. required times during this entire period.

There were no safety consequences associated with this event. Although WNP-2 was technically not in compliance with T.S. requirements for 1) the frequency of testing certain valves between December 1983 and June 1984 and 2) specific closing times of RRC-V-16A and -16B, there was no hazard created for either Plant personnel or the public. All valves were operational within T.S. required times, with the exception of RRC-V-16A and -16B which were within presently specified T.S. limits. RRC-V-16A and -16B are motor-operated valves which receive no automatic close signals.

Washington Public Power Supply System

P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

Docket No. 50-397

November 21, 1984

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: NUCLEAR PLANT NO. 2
LICENSEE EVENT REPORT NO. 84-100-01

Dear Sir:

Transmitted herewith is Licensee Event Report No. 84-100-01 for WNP-2 Plant. This report provides supplemental information to LER 84-100 and provides additional information on actions taken to preclude recurrence.

Very truly yours,

JM Powers for
J. D. Martin (M/D 927M)
WNP-2 Plant Manager

JDM:mm

Enclosure:
Licensee Event Report No. 84-100-01

cc: Mr. John B. Martin, NRC - Region V
Mr. A. D. Toth, NRC - Site (901A)
Ms. Dottie Sherman, ANI
INPO Records Center - Atlanta, GA

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