

## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) McGuire Nuclear Station - Unit 2										DOCKET NUMBER (2) 0 5 0 0 0 3 7 0					PAGE (3) 1 OF 4										
TITLE (4) Snubbers Removed Without Proper Clearance																									
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	1	2	3	8	5	8	5	0	0	2	0	0	0	2	5	8	5	0	5	0	0	0			
OPERATING MODE (9) 2		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(c)				50.73(a)(2)(iv)				73.71(b)											
		20.406(a)(1)(i)				50.36(e)(1)				<input checked="" type="checkbox"/> 50.73(a)(2)(v)				73.71(c)											
		20.406(a)(1)(ii)				50.36(e)(2)				50.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)											
		20.406(a)(1)(iii)				50.73(a)(2)(i)				50.73(a)(2)(vii)(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)																									
NAME Scott Gewehr - Licensing										TELEPHONE NUMBER AREA CODE 7 0 4 3 7 3 - 7 5 8 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)												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 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On January 25, 1985, it was determined that the removal of two snubbers as part of a nuclear station modification was performed without proper administrative controls. A subsequent analysis showed that removal of the snubbers had no effect on the operability of the system, Chemical and Volume Control (NV). NRC-REGION II had been notified in December, 1983, of Duke's intent to remove the snubbers, as required by Technical Specifications. However, the snubbers were removed by craft personnel without the prior knowledge and consent of the Shift Supervisor.

The major cause of this event is considered to be an administrative deficiency, due to inadequate training and guidance provided to craft personnel by their supervision. A procedural deficiency also contributed to this event, in that a maintenance procedure did not clearly enough convey the requirement for a shift supervisor's signature. Corrective actions will address clarification, in both instruction to craft personnel and procedures, as to the requirements for prior approval by the Shift Supervisor. The health and safety of the public were not affected.

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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/85

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

INTRODUCTION: On January 17 and 18, 1984, Station Support Division (SSD) personnel removed two snubbers, along with their associated hangers, without obtaining clearance from the Shift Supervisor. The snubbers were attached to a chemical and volume control system (NV) relief line to the Recycle Holdup Tank. Subsequent evaluation showed that the snubber removal did not affect the operability of the NV system piping, although the removal itself was improperly executed.

Unit 2 was in Mode 2 at the time the snubbers were declared inoperable.

This event is classified as an Administrative/Procedural Deficiency, due to lack of training and guidance provided by SSD supervision to the craft personnel, and incorrect instructions given to SSD personnel by Maintenance personnel. A Procedural Deficiency is a contributing factor because the wording in the procedure used may have led Maintenance personnel to believe the Shift Supervisor did not need to sign a step in the procedure giving clearance to begin work.

EVALUATION: On January 17 and 18, 1984, SSD personnel removed two snubbers along with their associated hangers. These snubbers were removed while working on a nuclear station modification (NSM) using a documentation system known as a Shutdown Request. The affected NV system piping was considered operable when the snubbers were removed; the affected piping should have been declared inoperable prior to commencing work. By removing the snubbers, the NV system was left with a partially completed NSM on an operable system. (The snubber removal had been approved as a part of the entire NSM package).

When it was determined that the snubbers should not have been removed, the snubbers were declared inoperable and the action statement of Technical Specification (T.S.) 3.7.8 was entered. The action statement of 3.7.8 requires that within 72 hours of declaring a snubber inoperable, the snubber must be made operable or the affected system declared inoperable. Unit 2 was in Mode 5 within 72 hours of declaring the snubbers inoperable. Unit 2 was already in the process of shutting down in preparation for an outage. The affected piping was not required to be operable in Mode 5 so the action statement was met. After the snubbers were discovered missing, Design personnel evaluated the effect of the missing snubbers on the operability of the system. They determined that operability of the NV system was not affected.

Station Directives and Construction Procedures require the following:

1. Construction Supervisor will notify the Shift Supervisor (or his designated representative), of work to be performed,
2. The Shift Supervisor will sign the Shutdown Request verifying that the system to be worked on is drained, isolated, or deenergized as required.
3. A copy of the Shutdown Request will be left with the Shift Supervisor.

Neither the Shift Supervisor nor anyone else in Operations was contacted prior to starting work and the "Verified By" line on the Shutdown Request (where the Shift Supervisor should sign) was blank.

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

Procedures MP/O/A/7650/62 (Removal, Replacement and Operational Inspection of PSA Mechanical Snubbers) and MP/O/A/7700/08 (New Hanger Erection or Existing Hanger Modification) were among the procedures SSD used when removing the snubbers. All state that the Shift Supervisor shall be notified prior to removing a hanger or snubber from service. Enclosure 13.1 of MP/O/A/7700/08 has a sign off step (step 6.1) for the Shift Supervisor to ensure that all prerequisites have been met.

Two SSD Powerhouse Mechanics were given the Shutdown Request and NSM paperwork by their supervisor and told to start work. One SSD mechanic was assigned to take care of the piping work and the other assigned to the hanger portion.

Some of the initial piping and hanger work was completed but no tie-in to the original NV system piping was made. The SSD mechanic working on the hangers stated that he knew they couldn't do any work that would affect the existing system until the upcoming Unit 2 outage.

Since the snubbers were to be deleted per that NSM, SSD personnel considered removing them before the upcoming Unit 2 outage in order to get a head start on this particular NSM work. The SSD Powerhouse Mechanic (SSD Mech) working on the hangers discussed with a Maintenance Specialist (Maint Tech) whether or not he could remove the snubbers. The SSD Mech stated that the following discussion occurred. The SSD Mech asked the Maint Tech if he could remove the snubbers. The SSD Mech showed step 6.1 of Enclosure 13.1, MP/O/A/7700/08 to Maint Tech and asked the Maint Tech if the Shift Supervisor needed to sign off this step prior to beginning work. The Maint Tech told the SSD Mech that he did not need this step signed off. The SSD Mech and the SSD Technical Support personnel present during the discussion interpreted what the Maint Tech said as meaning that they could remove these snubbers without requiring clearance from the Shift Supervisor.

The Maintenance Technical Specialist stated that the following occurred. When the SSD Mech asked him if he could remove the snubbers, he assumed the SSD Mech was talking about working on an inoperable system. The Maint Tech thought SSD would have the affected piping isolated using the Shutdown Request with clearance given by the Shift Supervisor on the Shutdown Request itself. The Maint Tech inspected SSD's paperwork and since SSD had the correct procedures and NSM paperwork, he told them they could go ahead and remove the snubbers. The Maint Tech stated that he told SSD personnel that step 6.1 of Enclosure 13.1, MP/O/A/7700/08 did not have to be signed off. Since the Maint Tech thought that clearance would be given and the system made inoperable per the Shutdown Request, he thought step 6.1 did not need to be signed off. The way the sign off step 6.1 is written, it looks like the Shift Supervisor should sign it only if the system will be operable when the work is to be performed. If the system will be inoperable, it looks like the Shift Supervisor's signature is not required. The Shift Supervisor's signature is actually required in both cases.

The SSD Mech stated that although he had previously worked under Shutdown Requests, he had never previously prepared the paperwork for a Shutdown Request. He did not realize the Shift Supervisor's signature was required on the "Verified By" line

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

on the Shutdown Request. SSD had recently changed over from using Construction procedures to Maintenance procedures and the SSD Mech stated that he had not used these procedures before. Prior to beginning work, he read MP/O/A/7700/08 and MP/O/A/7650/62. He read that the Shift Supervisor was supposed to be notified prior to removing snubbers, but he thought it was not required in this case. Since the snubbers were deleted per the NSM and Maintenance told him he could remove the snubbers without the Shift Supervisors signature on procedure MP/O/A/7700/08, SSD personnel thought they had adequate clearance to begin work. The SSD Mech gave the paperwork to other SSD Powerhouse Mechanics to do the work and told them the pre-requisites to begin work were satisfied.

**CORRECTIVE ACTION:** Craft Personnel will be instructed that only Operations Personnel (e.g., Shift Supervisor) can give clearance to begin work. Appropriate procedures will also be changed to more clearly reflect that requirement. The process of obtaining clearance and handling paperwork will be the responsibility of Technical Support personnel, rather than the craft people.

All Shutdown Requests will be converted to work requests, as used by other station personnel, and Station Support Division personnel will be trained in their use.

**SAFETY ANALYSIS:** Although the work was improperly executed, the operability of the NV system was not affected. The health and safety of the public were not affected by this incident.



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VICE PRESIDENT  
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March 14, 1985

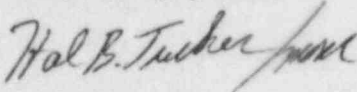
Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Subject: McGuire Nuclear Station, Unit 1  
Docket No. 50 370  
LER 370/85-02

Gentlemen:

Pursuant to 10 CFR 50.73 Sections (a)(1) and (d), attached is Licensee Event Report 370/85-02 concerning the Improper Removal of Two Snubbers, which is submitted in accordance with §50.73 (a)(2)(v). This event was considered to be of no significance with respect to the health and safety of the public.

Very truly yours,



Hal B. Tucker

SAG/mjf

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator  
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