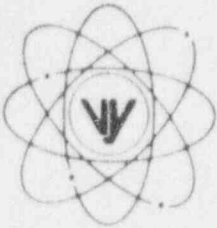


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

March 1, 1996

BVY # 9619

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

REFERENCE: Operating License DPR-28
Docket No. 50-271
Reportable Occurrence No. LER 96-001

Dear Sirs:

As defined by 10 CFR 50.73, we are reporting the attached Reportable Occurrence as LER 96-001.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

Robert J. Wanczyk
Robert J. Wanczyk
Plant Manager

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

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NRC Form 366 U.S. NUCLEAR REGULATORY COMMISSION (4-95)				APPROVED BY OMB NO. 3150-0104 EXPIRES 04/30/98 ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.												
LICENSEE EVENT REPORT (LER)																
FACILITY NAME (1) VERMONT YANKEE NUCLEAR POWER STATION						DOCKET NUMBER () 05000271				PAGE (3) 01 OF 03						
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)				
02	02	96	96	-- 01 --	00	03	01	96	N/A			05000				
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: CHECK ONE OR MORE (11)														
N		20.2201(b)		20.2203(a)(2)(v)		X		50.73(a)(2)(i)		50.73(a)(2)(viii)						
POWER LEVEL (10)		20.2203(a)(1)														
100		20.2203(a)(2)(i)		20.2203(a)(3)(ii)				50.73(a)(2)(ii)		50.73(a)(2)(x)						
		20.2203(a)(2)(ii)		20.2203(a)(3)(iii)				50.73(a)(2)(iii)		73.71						
		20.2203(a)(2)(iii)		20.2203(a)(4)				50.73(a)(2)(iv)		OTHER						
		20.2203(a)(2)(iv)		50.36(c)(1)				50.73(a)(2)(v)		(Specify in Abstract below or in NRC Form 366A)						
		20.2203(a)(2)(v)		50.36(c)(2)				50.73(a)(2)(vii)								
LICENSEE CONTACT FOR THIS LER (12)																
NAME ROBERT J. WANCZYK, PLANT MANAGER								TELEPHONE NO. (Include Area Code) 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	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS
N/A					N/A					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)

On 2/2/96, while operating at 100% power, an in-depth Vermont Yankee review of our Inservice Test Program initiated as a result of corrective actions initiated by LER 95-17, identified additional valves which should also be included in the program. Since these valves were not included within the scope of the IST Program, the requirements of Technical Specification Surveillance Requirement 4.6.E were not met. At this time the root cause of this event remains as stated in LER 95-17, Supplement 1, which is due to an inadequate technical review performed during the 1993 program update. Additional root cause investigations are being performed for this event to verify this cause. A Basis for Maintaining Operation was prepared and determined that the plant will continue to operate safely even though the subject valves were not previously tested in the Vermont Yankee IST program. The valves will be added to the program and tested prior to startup from the 1996 refueling outage.

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VERMONT YANKEE NUCLEAR POWER CORPORATION		05000271	YEAR	SEQUENTIAL NUMBER	REV #	02 OF 03
			96	-- 01 --	0	

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

DESCRIPTION OF EVENT

As reported in LER 95-17, Short Term Corrective Action 2, Vermont Yankee committed to perform a comprehensive review of the IST program scope to verify compliance with ASME/ANSI OMA-1988 Parts 1, 6 and 10. On 2/2/96, while operating at 100% power, this review identified thirteen additional valves which should have been included in the scope of the Vermont Yankee IST Program. The valves identified include Reactor Building Closed Cooling Water (RBCCW) (EIS=CC) heat exchanger relief valves SR-70-1A & B and SR-70-2A & B (EIS=RV); Fuel Pool Cooling Heat (FPC) (EIS=DA) Exchanger Relief Valves, SR-70-6A & B and RV-70-260A & B (EIS=RV); Standby Fuel Pool Cooling (SFPC) (EIS=DA) Isolation Check Valve, V19-224 (EIS=V); and Safety Relief Valve Exhaust Line Vacuum Breakers, SR-2-14A, B, C, and D (EIS=V).

CAUSE OF EVENT

At this time it is believed that the root cause of this event was due to an inadequate technical review performed during the 1993 IST Program update, as stated in LER 95-17 Supplement 1. Additional Cause investigation is being performed for this event. Should additional root causes be identified they will be reported in a supplement to this LER.

ANALYSIS OF EVENT

Section 4.6.E of the Vermont Yankee Technical Specifications specifies that the 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 the reactor to the cold shutdown condition, in maintaining the cold shutdown condition, or in mitigating the consequences of an accident."

SR-70-1A & B and 2A & B (RBCCW Heat Exchanger Relief Valves); SR-70-6A & B and RV-70-260 A & B (Fuel Pool Heat Exchanger Relief Valves); protect portions of the RBCCW and Fuel Pool systems which perform a function in mitigating the consequences of an accident. V19-224 (Standby Fuel Pool Cooling Isolation Check Valve) has a function to support the operation of the Standby Fuel Pool Cooling System which performs a function in mitigating the consequences of an accident. SR-2-14 A, B, C & D (Safety Relief Valve Exhaust Line Vacuum Breakers) have a safety function to remain closed to prevent steam from entering the containment during relief valve operation.

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 RBCCW and Fuel Pool relief valves that overpressurization of the RBCCW or Fuel Pool pipework was unlikely due to the limited sources of high pressure fluids and the inherent reliability of relief valves. External visual inspection of the subject relief valves has revealed that there is no evidence of excessive corrosion,

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leaks, or mechanical binding which would degrade the valves ability to perform their safety function.

The BMO concludes the Standby Fuel Pool Cooling Check Valve would operate as it is a stainless steel check valve that operates in a mild service environment and is relatively new as it was installed in 1993. It is unlikely that this valve has seen significant wear and has not been subjected to a corrosive environment, thus there is a reasonable assurance that the valve would operate as required. Additionally, the valve is located upstream of a redundant Safety Class 3 check valve which is tested in accordance with the requirements of OM-10.

The BMO identifies the safety function of the SRV Relief Valve exhaust line vacuum breakers is to stay closed. Closure of these valves is visually verified during drywell closeout inspections at the end of each refueling outage. During the 1995 inspection there were no abnormal indications noted concerning the status of these valves. The relief valves are exercised during each startup from refueling, and a review of Control Room Logs reveals no abnormal indications providing assurance that the check valves are closed.

CORRECTIVE ACTIONS

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.

This event was identified during implementation of the corrective actions of LER 95-17. Additional corrective actions beyond those already in progress as a result of LER 95-17 are not felt to be necessary at this time, however should the root cause investigation currently in progress for this event identify a different root cause and additional corrective actions a supplement to this LER will be submitted. The root cause investigation is expected to be completed by 3/31/96.

Until an alternate testing method that meets the requirements of ASME OMa-1988 Part 10 is developed the Standby Fuel Pool Cooling check valve (V19-224) will be added to the list of valves subject to quarterly radiography.

The relief valves and the SRV vacuum breakers will be included in the IST Program and adequately tested no later than startup from the 1996 refueling outage.

ADDITIONAL INFORMATION

A similar event was identified by the NRC as a violation of the requirements of 10 CFR 50.55a in Inspection Report 95-22 dated 10/20/95. Vermont Yankee responded to this violation by letter (BVY 95-124) dated 11/16/95. LER 95-17 and LER 95-17 Supplement 1 also identified certain valves which were not included in the scope of the Vermont Yankee IST Program.