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Writer's Direct Dial Number:

April 12, 1996  
6730-96-2130

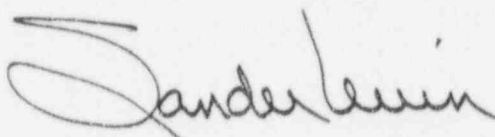
U. S. Nuclear Regulatory Commission  
Attn.: Document Control Desk  
Washington, DC 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Licensee Event Report 96-001

Enclosed is Licensee Event Report 96-001. This event did not impact the health and safety of the public.

If any additional information or assistance is required, please contact Mr. John Rogers of my staff at 609.971.4893.

  
for Michael B. Roche  
Vice President and Director  
Oyster Creek

MBR/JJR  
Enclosure

cc: Oyster Creek NRC Project Manager  
Administrator, Region I  
Senior Resident Inspector

9604190103 960412  
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S PDR

190040

EXPIRES 04/30/98

## LICENSEE EVENT REPORT (LER)

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 (7-6 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.

FACILITY NAME (1)

Oyster Creek Unit 1

DOCKET NUMBER (2)

05000 - 219

PAGE (3)

1 of 4

TITLE (4)

Technical Specification Required Surveillances Missed Due To Procedural Inadequacy

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 NUMBER
03	13	96	96	-- 001 --	00					05000
									FACILITY NAME	DOCKET NUMBER
										05000
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
			20.2201(b)			20.2203(a)(2)(v)		X	50.73(a)(2)(i)	50.73(a)(2)(viii)
POWER LEVEL (10)		100	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

Mr. John Yuen

TELEPHONE NUMBER (Include Area Code)

609.971.2306

## 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

## SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).	X NO	EXPECTED SUBMISSION	MONTH	DAY	YEAR
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## ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On March 13, 1996, maintenance work was performed on the Secondary Containment Isolation Valves V-28-0042 and V-28-0043. The post maintenance test to stroke these valves one at a time could not be performed using the existing procedure. Further review revealed that these valves had not been functionally tested to demonstrate full Technical Specification compliance since 1987.

The root cause of the missed surveillances on V-28-0042 and -0043 was a narrow focus on the part of the preparers and reviewers of the modification in that the modification package concentrated on the electrical aspects of the modification and did not ensure the basic intent of the modification would be tested and maintained. This resulted in an inadequate surveillance procedure.

Upon discovery of the condition, the two valves were tested to verify automatic closure in response to an isolation signal. Procedures relating to secondary containment isolation valves will be reviewed and revised as necessary to include testing of V-28-0042 and -0043. A modification to the reactor building ductwork will be made to allow leak testing for these two valves. Additionally, the procedures controlling the modification process will be reviewed to determine if any additional revisions would be beneficial.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
Oyster Creek, Unit 1	05000	YEAR	SEQUENTIAL NUMBER	REV	2 of 4
	-219	96	-- 001 --	00	

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

**DATE OF DISCOVERY**

On March 13, 1996, it was discovered that Valves V-28-0042 and V-28-0043 (EHS Component ISV) had not been tested to close automatically on an isolation signal as required by Technical Specifications.

On March 25, 1996, it was discovered that valves V-28-0042 and V-28-0043 had not been tested during the performance of the Secondary Containment Leak Rate Test as required by Technical Specifications.

**IDENTIFICATION OF OCCURRENCE**

Technical Specifications require that Secondary Containment Isolation Valves be tested for both closure on receipt of an isolation signal, and ability to maintain secondary containment. After a modification installed in 1987, procedures were not revised to require this testing on valves V-28-0042 and -0043. This has been determined to be reportable under 10 CFR 50.73(a)(2)(i).

**CONDITIONS PRIOR TO DISCOVERY**

At the time of discovery, the reactor plant was operating at normal temperatures and pressures for full power operation. However, the reactor plant has been operated in all modes since 1987.

**DESCRIPTION OF OCCURRENCE**

Valves V-28-0042 and -0043 are series isolation valves on the drywell air supply line. They are in series with Primary Containment Isolation valves V-27-0003 and V-27-0004. On October 26, 1987, a design deficiency was discovered with V-28-0042 and -0043 in that they did not automatically close on a reactor building isolation signal. This was reported in LER 87-042 and a modification was made to the valve circuitry to enable automatic closure.

On March 13, 1996, maintenance work was performed on the Secondary Containment Isolation Valves V-28-0042 and V-28-0043. The post maintenance test to stroke these valves could not be performed using the existing procedure. Further review revealed that there were no surveillance procedures to demonstrate that these valves met full Technical Specification compliance since 1987.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REV	
Oyster Creek, Unit 1	05000 -219	96	-- 001 --	00	3 of 4

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

**APPARENT CAUSE OF OCCURRENCE**

The root cause of the missed surveillances on V-28-0042 and V-28-0043 was a narrow focus on the part of the preparers and reviewers of the modification in that the modification package concentrated on the electrical aspects of the modification and did not ensure the basic intent of the modification would be tested and maintained. This resulted in an inadequate surveillance procedure.

**ANALYSIS OF OCCURRENCE**

The Secondary Containment Isolation Valves are provided in the Reactor Building, and close automatically when either: 1) a high radiation level is detected in the Reactor Building, or 2) a primary containment isolation signal is received. The two valves are part of the Secondary Containment boundary when the two Primary Containment isolation valves in the line are open. V-28-0042 and -0043 are normally closed, and are opened when the plant is shutdown or during drywell deinerting.

During a refueling outage when these two valves would be open, the Standby Gas Treatment System is tested weekly by required surveillances. The containment isolation valves are indicated in the control room with red and green lights. Although the surveillance does not document valve position, the valves would have cycled at the same time as all of the other containment valves and would have given the same indications. A failure to close would have been noted and a maintenance work request initiated. Therefore, it is concluded that proper valve motion has been observed in the past. Furthermore, as the two valves passed an isolation test on March 16, 1996, it is reasonable to conclude that they would have performed as designed for automatic closure if they had been needed.

The Technical Specifications require not only valve movement, but also leak tightness. The only time that these valves could be tested at present is when the plant is shutdown and primary containment is not required. The Standby Gas Treatment System is tested weekly. When the plant is shutdown and primary containment is relaxed, the Standby Gas Treatment System does test the leak tightness of these two valves. Although the procedure does not require the documentation of proper reactor building flow or d/p, any deviation from the allowable flow or d/p would have been observed by the control room operators and a maintenance work request initiated. It is concluded that the valves would have performed as designed for leak tightness if they had been needed.

As both the ability to automatically close on an isolation signal and the leak tightness of these valves has been demonstrated, the safety significance of this event is minimal.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REV	
Oyster Creek, Unit 1	05000 -219	96	001	00	4 of 4

TEXT (If more space is required use additional copies of NRC Form 365A) (17)

## CORRECTIVE ACTION

**Immediate**

Upon discovery of the condition, the two valves successfully passed a test to verify automatic closure in response to an isolation signal. Additionally, a qualitative test was performed to demonstrate the leak tightness of the valves.

**Long Term**

Procedures relating to secondary containment isolation valves will be reviewed and revised as necessary to include testing of these valves. This will be completed by August 1, 1996.

A modification to the reactor building ductwork will be made to facilitate leak testing for these two valves. This modification will be completed by September 1, 1996.

The modification process has been revised since 1987 to ensure proper focus on the basic intent of the configuration change is maintained. Additionally, the procedures controlling the modification process will be reviewed to determine if any additional revisions would be beneficial.

## SIMILAR EVENTS

None.