

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO 3150-0104
EXPIRES 8/31/85

FACILITY NAME (1) BYRON, UNIT 1	DOCKET NUMBER (2) 0 5 0 0 0 4 5 4	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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TEXT (If more space is required, use additional NRC Form 365A's) (17)

During a routine ISI internal audit, it was found that the position indication test, an ASME Section XI requirement, for the ISI8809A valve was outside of its surveillance interval. The Operating Engineer was notified and the valve was declared inoperable on 01-24-85 at approximately 1100 hours. Inoperability of this valve results in an inability to remotely isolate the residual heat removal system from cold leg injection, and subsequent switch to hot leg injection, after a LOCA. This action is by administrative control and normally takes place 17 to 24 hours after the accident. This type of time frame would allow sufficient time for an operator to manually close the valve if it did fail to function. The Unit was in Mode 3 at the time of the event.

During the investigation of the event, it was noted that:

1. The ISI8809A valve was one of a number of valves recently added to the ISI Valve Program. The Program was approved by the NRC on December 10, 1984. This valve was subsequently added to the stroke test surveillance but inadvertently left out of a corresponding Position Indication Test (PIT) surveillance. This was due to a miscommunication within the Technical Staff.
2. On December 27, 1984, the ISI8809A, B valves were stroke tested in a valve operability surveillance. This test stroke timed the valves from Open to Closed using the indication in the control room, and hence, demonstrated that the valve was capable of performing its safety function. But the stroke time obtained was questionable since the position indication system had not been verified accurate by a PIT.
3. On January 24, 1985, the ISI Group found that the ISI8809A was outside of its surveillance interval for a PIT.

At approximately 1500 on 01-24-85, the valve was tested and satisfactorily passed the surveillance requirements. The surveillance had been due by the date of entering Mode 3, 01-10-85.

The surveillance procedure is being revised to incorporate the ISI8809 valves. All other ISI surveillances meet the requirements of the latest revision of the Preservice/Inservice Testing Program Plan for Valves and have been tested or have sufficient documentation in lieu of such testing.

A revision to the Station administrative procedure has been implemented such that all revised ISI surveillances require a review by the ISI Coordinator, or his designee, prior to implementation. This will assure all ISI requirements are in place prior to execution of the surveillances rather than after the data has already been obtained.

There are no previous occurrences of this event.



Commonwealth Edison
Byron Nuclear Station
4450 North German Church Road
Byron, Illinois 61010

DATE: February 19, 1985

LTR: BYRON 85-0263

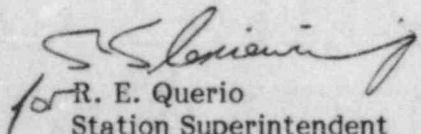
U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Dear Sir:

The enclosed Licensee Event Report from Byron Generating Station is being transmitted to you in accordance with the requirements of 10CFR 50.73(a)(2)(iv) which requires a 30 day written report.

This report is number 85-013-00, Docket No. 50-454.

Very truly yours,


for R. E. Querio
Station Superintendent
Byron Nuclear Power Station

Enclosure: Licensee Event Report No. 85-013-00

cc: J. G. Keppler, NRC Region III Administrator
J. Hinds, NRC Resident Inspector
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