

Detroit
Edison

Douglas R. Gipsón
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Fermi 2
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10CFR50.73

May 28, 1996
NRC-96-0034

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

Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Licensee Event Report (LER) No. 96-006

Detroit Edison is submitting the enclosed Voluntary LER No. 96-006 regarding a missed ASME Section XI required inspection due to an incorrectly grouped check valve in the Inservice Testing (IST) Program. Detroit Edison determined that based on previous testing and performance of similar valves, the operability of the valve was not in doubt. The check valve was inspected during a recent forced outage and no significant change was identified from the previous inspection.

The following commitments are made in this LER:

Relief request VR-48 will be revised to include only the three six inch check valves. Valve P4400F116B will be grouped by itself for inspection and disassembly. The pump and valve IST Program will be revised to incorporate the revised refueling outage justification relief requests groupings.

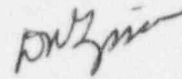
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If you have any questions, please contact Ken Riches at (313) 586-5529.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Riches", written in a cursive style.

cc: T. G. Colburn
M. J. Jordan
H. J. Miller
A. Vogel
M. V. Yudas, Jr.
Region III

Wayne County Emergency Management Division

LICENSEE EVENT REPORT (LER)

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TITLE (4) **Missed ASME Section XI Required Surveillance Inspection Due to an Incorrect Inservice Testing (IST) Program Check Valve Grouping.**

EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)			
MON	DAY	YR	YR	SEQUENTIAL NUMBER		REVISION NUMBER	MON	DAY	YR	FACILITY NAMES		DOCKET NUMBER (S)	
03	24	96	96	-	0 0 6	- 0 0	05	28	96			0 5 0 0 0	
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OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR (11)	
POWER LEVEL (10) 0 9 6	<input checked="" type="checkbox"/> 10 CFR Voluntary <input type="checkbox"/> OTHER - (Specify in Abstract below and in text, NRC Form 366A)	

LICENSEE CONTACT FOR THIS LER (12) Ken Riches - Compliance Engineer		TELEPHONE NUMBER AREA CODE 313 NUMBER 586-5529	
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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)	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO			

ABSTRACT (16)

Detroit Edison is submitting this voluntary LER regarding a missed ASME Section XI required inspection due to an incorrectly grouped check valve in the Inservice Testing (IST) Program. Detroit Edison determined that based on previous testing and performance of similar valves, that the operability of the valve was not in doubt. The check valve was inspected during a recent forced outage and no significant change was identified from the previous inspection.

The cause of this event was inadequate review of a change to a pending relief request in the Fermi 2 IST Program when incorporating guidance from Generic Letter (GL) 89-04. The incorrect check valve grouping, due to the different valve size for otherwise similar criteria, was not identified when the review of the IST Program for conformance to the GL 89-04 requirements was performed.

Relief request VR-48 will be revised to include only the three six inch check valves. Valve P4400F116B will be grouped by itself for inspection and disassembly. The pump and valve IST Program will be revised to incorporate the revised refueling outage justification relief request groupings. This incorrect grouping has been verified to be an isolated occurrence, and no additional long term corrective action is required.

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Initial Plant Condition:

Operational Condition: 1 (Power Operation)
 Reactor Power: 96 Percent
 Reactor Pressure: 1024 psig
 Reactor Temperature: 540 degrees Fahrenheit

Description of the Event:

A. Background

NUREG 1482, "Guidelines for Inservice Testing at Nuclear Power Plants," as related to inservice testing (IST), explains that Generic Letter 91-18 defines a "code noncompliance" as either a missed surveillance test or the identification of a component that must be added to the IST program, and either of these represent a nonconforming condition. That is, the "qualification" of the system, subsystem, or component (SSC) is being called into question. A nonconforming condition that deals with the qualification of a component must be dealt with at a level of quality and safety commensurate with the safety function of the component. To resolve the qualification issue, the licensee may prepare a "justification for continued operation," while corrective action is being taken. Corrective action may include processing a request for exigent code relief or preparing a cold shutdown or refueling outage justification.

Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," Position 2, allows for grouping of valves of the "...same design (manufacturer, size, model number, and materials of construction)..." so that they may be disassembled and inspected on a sampling basis. For grouping of valves, Position 2 of GL 89-04 also establishes criteria for similar configurations and service conditions.

In 1985, when valve relief request (VR) VR-48, which is a refueling outage justification, was first formally incorporated into the program, the guidelines of GL 89-04 did not exist. VR-48 grouped all four Emergency Equipment Cooling Water (EECW) return check valves [BI][V] into a common group based on service conditions, model type (3061 AWE), and configuration. The proposed "Alternate Testing" section of the relief request stated: "Valve disassembly and inspection will occur at every refueling outage until sufficient data can be accumulated to adequately monitor valve degradation. The maximum inspection intervals will be determined based on an evaluation of that data."

B. Event Description

On March 24, 1996, due to questions raised during a self-assessment of service water systems, the grouping of the Division II EECW return header check valve was questioned. Relief Request VR-48-R2 incorrectly classified valve P4400F116B with other EECW check valves. Valve P4400F116B is an 8-inch Powell swing check valve, whereas the other valves that it was grouped

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with are 6-inch Powell swing check valves. This grouping is not in accordance with Position 2 of GL 89-04. An immediate operability determination was performed to document the expectation that the check valve would satisfactorily perform its required function.

This LER is being submitted as a voluntary report since there was no documentation in place that would have justified extending the inspection frequency beyond a once per refueling outage basis. Therefore, when this valve was not inspected during the fourth refueling outage, this was administratively considered as a missed American Society of Mechanical Engineers (ASME) Boiler and Pressure Code, Section XI, required inspection.

Cause of the Event:

The cause of this event was inadequate review of a change to a pending relief request in the Fermi 2 IST Program in December 1993 when incorporating guidance from GL 89-04. The check valve incorrect grouping, due to the different valve size for otherwise similar criteria, was not identified when the review of the IST Program for conformance to the GL 89-04 requirements was performed.

Analysis of the Event:

Based on the surveillance interval for similar valves in the plant, the inspection frequency for P4400F116B is expected to be at least based on an every two refueling outage basis. P4400F116B was last inspected during the third refueling outage and has been partially stroked in accordance with GL 89-04 guidance on a 92 day frequency since a 1995 program change including VR-48-R2 was incorporated. Furthermore, during a recent forced outage, the valve was disassembled and inspected, and there was no significant degradation from the last inspection. Therefore, Detroit Edison concluded that there was no valve operability concern with the missed ASME Section XI inspection.

Corrective Actions:

A. Immediate Corrective Actions

The check valve was successfully inspected in April 1996 during a forced outage.

B. Corrective Actions to Prevent Recurrence

Relief request VR-48 will be revised to include only the three six inch check valves. Valve P4400F116B will be grouped by itself for inspection and disassembly. The pump and valve IST Program will be revised to incorporate the revised refueling outage justification relief requests groupings. This incorrect grouping has been verified to be an isolated occurrence, and no additional long term corrective action is required.

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Additional Information:

A. Failed Components

None

B. Previous LERs on Similar Problems

None