

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)										DOCKET NUMBER (2)										PAGE (3)									
Monticello Nuclear Generating Plant										0 5 0 0 0 2 6 3 1										OF 0 4									
TITLE (4)										Missed Surveillance Requirement Caused by Failure to Include Emergency Service Water Valves in Section XI Testing Program																			
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 5 0 0 0															
0	7	2	5	9	2	9	2	0	1	0	0	1	1	1	7	9	2	0 5 0 0 0											
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 8. (Check one or more of the following) (11)																										
N			20.402(b)				20.405(c)				80.73(a)(2)(iv)				73.71(b)														
POWER LEVEL (10)			20.406(a)(1)(i)				80.38(a)(1)				80.73(a)(2)(v)				73.71(c)														
1 0 0			20.406(a)(1)(ii)				80.38(a)(2)				80.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 368A)														
			20.406(a)(1)(iii)				XX 80.73(a)(2)(i)				80.73(a)(2)(vii)(A)																		
			20.406(a)(1)(iv)				80.73(a)(2)(ii)				80.73(a)(2)(vii)(B)																		
			20.406(a)(1)(v)				80.73(a)(2)(iii)				80.73(a)(2)(ix)																		
			20.406(a)(1)(vi)				80.73(a)(2)(iv)																						
			20.406(a)(1)(vii)				80.73(a)(2)(v)																						
			20.406(a)(1)(viii)				80.73(a)(2)(vi)																						
			20.406(a)(1)(ix)				80.73(a)(2)(vii)																						
			20.406(a)(1)(x)				80.73(a)(2)(viii)																						
LICENSEE CONTACT FOR THIS LER (12)																													
NAME										TELEPHONE NUMBER																			
Steve Hammer, Supt Turbine Systems Engineering										AREA CODE 6 1 2 2 9 5 - 1 3 0 0																			
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																													
CAUSE	SYSTEM	COMPONENT	MANUFAC- TURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFAC- TURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFAC- TURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFAC- TURER	REPORTABLE TO NPRDS										
SUPPLEMENTAL REPORT EXPECTED (14)															EXPECTED SUBMISSION DATE (15)					MONTH	DAY	YEAR							
YES (If yes, complete EXPECTED SUBMISSION DATE)															XX NO														

On July 25, 1992, during a Design Bases Document review of the Emergency Service Water system, it was identified that four valves used to mitigate the consequences of a High Energy Line Break were not included in the ASME Section XI Testing Program as required by Technical Specifications. The cause of the event was a failure to identify the need to exercise manual valves as part of the ASME Section XI Testing program. The applicable abnormal operating procedure was revised to provide direction if the valves failed to operate, a test was performed to confirm adequate cooling would be provided when the Emergency Service Water system is cross connected, and a review of all abnormal procedures was conducted to identify other components to be included in the ASME Section XI program. Administrative controls will be revised to require a review of abnormal operating procedures for ASME Section XI components. The lessons learned from this event will be presented in Engineering and Technical Staff Continuing Training.

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LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMP. WITH THIS
INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD
COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION
AND RECORDS MANAGEMENT BRANCH (MNBB 7714), 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)		DOCKET NUMBER (2)		LER NUMBER (6)			PAGE (3)
Monticello Nuclear Generating Plant		05000 263		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
				92	010	01	

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

DESCRIPTION

On July 25, 1992, at 100% power, during the performance of a Design Bases Document review of the Emergency Service Water (EIS System: BI) system it was determined that four valves which would be used to mitigate a postulated High Energy Line Break Accident were not tested as required by Technical Specifications.

Technical Specification 4.15.B states, in part, that "Inservice Testing of Quality Group A, B, and C pumps and valves shall be performed ...". The four valves not tested are ESW-1-1 (11 ESW Pump Discharge Check; included in Section XI testing program but not for stoppage of reverse flow), ESW-2-2 and ESW-2-1 (ESW System Cross-ties), and ESW-5-2 (12 ESW Pump Strainer Outlet). These valves are used to mitigate a postulated High Energy Line Break in the Feedwater Pump (EIS System: SJ) area. During this postulated event, a loss of off-site power, a failure of 12 Diesel Generator, and damage to the 11 Emergency Service Water Pump power supply must be assumed. The abnormal procedure directs the operators to cross-tie 12 Emergency Service Water Pump discharge to supply cooling water to the 11 Emergency Diesel Generator (See Figure 1, attached). ESW-1-1, ESW-2-1, ESW-2-2, and ESW-5-2 would be required to function to insure adequate cooling to 11 Emergency Diesel Generator. None of the four valves are tested for these specific functions in the ASME Section XI Testing Program.

This event is reportable as a condition prohibited by Technical Specification because of the failure to perform a required surveillance.

CAUSE

The cause of the event was a failure to identify the need to exercise manual valves as part of the ASME Section XI Testing program. This was due to a misinterpretation of Article IWV-1000 regarding inclusion of manual valves. This was not a cognitive error by the engineering group assigned to the Section XI program. There were no unusual characteristics of the work location and this was not contrary to an approved procedure.

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

ANALYSIS

A test was performed on August 23, 1992, which demonstrated the ability of the components to perform the required functions. Based on the test results there were no consequences to the health and safety of the public.

CORRECTIVE ACTIONS

The following actions have been completed:

1. The procedure for loss of AC power with a High Energy Pipe Break near the Reactor Feedwater Pumps was revised on July 31, 1992, to include installation of blank flanges and/or removal of valve internals if needed to cope with valve failures.
2. A test was performed to confirm adequate cooling could be provided to the 11 Emergency Diesel Generator using 12 Emergency Service Water Pump and the normal Service Water system.
3. A review of all abnormal procedures was conducted to identify any additional ASME Section XI components that should be included in the Inservice Testing program. This review considered Class 1, 2 or 3 valves required to be repositioned to bring the reactor to cold shutdown or to mitigate the consequences of a design basis accident.

The following action will be completed:

1. Administrative controls associated with abnormal procedure writing will be revised to require a review for ASME Section XI requirements.
2. The lessons learned from this event will be presented in Engineering and Technical Staff Continuing Training. The lessons learned are that manual valves, including those used in abnormal procedures, which meet the scope requirements of IWV-1000 should be included in the Section XI Testing program.

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ADDITIONAL INFORMATION

Failed Component Identification:

None

Previous Similar Events:

The event described in Licensee Event Report 92-012-00, which was identified the day Licensee Event Report 92-010-00 was submitted, was similar in that it was a failure to include manual valves in the ASME Section XI Testing Program. The corrective action for LER 92-012-00 included a review of all Section XI systems to identify manual valves which should be included in the Section XI Testing program. The review had not been completed at the time Licensee Event Report 92-012-00 was submitted, but is now completed.