# VERMONT YANKEE
# NUCLEAR POWER CORPORATION

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May 16, 1996
BVY 96-64

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 96-011

Dear Sirs:

As defined by 10 CFR 50.73, we are reporting the attached Reportable Occurrence as LER 96-011.

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

210051

IE22 1/1

NRC Form 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION

**LICENSEE EVENT REPORT (LER)**

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.

| FACILITY NAME (1) | DOCKET NUMBER ( ) | PAGE (3) |
|---|---|---|
| VERMONT YANKEE NUCLEAR POWER STATION | 05000271 | 01 OF 03 |

TITLE (4) Failure to perform IST testing on valves that should have been included in the IST 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 NAME | DOCKET NO.(S) |
| 04 | 16 | 96 | 96 | -- 011 -- | 00 | 05 | 16 | 96 | N/A | 05000 |

| OPERATING MODE (9) | N |
|---|---|
| POWER LEVEL (10) | 100 |

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) |
| | 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 | TELEPHONE NO. (Include Area Code) |
|---|---|
| ROBERT J. WANCZYK, PLANT MANAGER | 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 |
|---|---|---|---|---|---|---|---|---|---|
| NA | | | | | NA | | | | |
| NA | | | | | NA | | | | |

| 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 4/16/96, while operating at 100% power, the Operations Engineering Analyst, while researching a suggested procedure change, identified that the check valves in the lines used for the alternate keep fill system of the High Pressure Coolant Injection (HPCI) and the Reactor Core Isolation Cooling (RCIC) systems were not included in the IST Program. On 4/17/96, while researching this issue a similar condition was identified in the Core Spray (CS) system where check valves for the alternate keep fill lineup were not included in the IST Program. Because these valves were not included in the IST Program IST testing required by Technical Specifications was not performed. The root cause of this event was determined to be a failure to perform the comprehensive system/component reviews during past IST program scope reviews to ensure that all required components were included in the IST program. A comprehensive review of the IST Program and development of a Basis Document for the IST Program are in progress as a result of a previous LER.

DESCRIPTION OF EVENT

On 4/16/96, while operating at 100% power, the Operations Engineering Analyst, while researching a suggested procedure change, identified that check valves in the lines used for the alternate keep fill system of the High Pressure Coolant Injection (HPCI) (EIIS = BJ) and Reactor Core Isolation Cooling (RCIC) (EIIS = BN) systems were not included in the IST Program.

On 4/17/96, while researching the condition identified on 4/16/96, a similar condition was identified in the Core Spray (CS) (EIIS = BM) system, where check valves for the alternate keep fill lineup were not included in the IST Program.

Because the above valves were not included in the IST Program, IST testing required by Technical Specification Section 4.6.E was not performed.

CAUSE OF EVENT

The root cause of this event has been determined to be a failure to provide the necessary comprehensive focus during past IST program scope reviews to ensure all required components were captured in the IST Program.

A contributing cause was identified as a failure to provide an adequate level of attention to the IST Program prior to 1995.

ANALYSIS OF EVENT

Pressurization lines are provided for all Emergency Core Cooling (ECCS) Systems to maintain the systems full of water to preclude the possibility of damage to the discharge piping due to water hammer action upon a pump start. The Condensate System and the Condensate Transfer System are used to provide the keep fill function. Check valves are provided in the pressurization lines to provide an isolation boundary between the safety related ECCS system and the non-safety related Condensate and Condensate Transfer Systems.

Normally the HPCI and RCIC systems are kept pressurized through the suction from the Condensate Storage Tank (CST). When CST level decreases below 35%, or when the pump suction is lined up to the torus, plant procedures line up the alternate keep fill from the condensate system through check valves, V23-20B (HPCI) and V13-20B (RCIC). The alternate keep fill lineups are rarely used.

Normally the CS system is kept pressurized from the Condensate System. During shutdowns, when the Condensate System is not available an alternate source is available from the Condensate Transfer system through Valves V14-11A/B and V14-23A/B. The alternate lineup for the CS system is only used during outages when the Condensate system is not available.

Radiography of all the affected check valves was performed on 4/25/96 and showed the valves to be performing satisfactorily.

Since the valves have been demonstrated to be functioning properly there were no adverse consequences to public health or safety as a result of this event.

CORRECTIVE ACTIONS

1. The alternate pressurization lines for HPCI, RCIC and CS were tagged out of service until IST testing of the check valves or appropriate procedure revisions could be performed.

2. On 4/25/96, radiography testing was performed on the check valves in the alternate pressurization lines for HPCI, RCIC, and CS. All valves tested satisfactorily.

3. Until an alternate testing method that meets the requirements of ASME OMa-1988 Part 10 is developed the HPCI (V23-20B), RCIC (V13-20B) and CS (V14-22A/B & V14-23A/B) have been added to the list of valves subject to quarterly radiography.

4. LER 95-17 committed to performance of a comprehensive review of the IST Program and the development of a Basis Document. These corrective actions are currently in progress and have resulted in the identification of additional program deficiencies (LER 96-01). These corrective actions are expected to be completed by 10/1/96. Any additional deficiencies identified during this review will be reported as supplements to LER 96-01.

5. Under the recent engineering reorganization, a dedicated program coordinator was provided for IST Program oversight to provide the enhanced focus required.

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, LER 95-17 Supplement 1 and LER 96-01 also identified valves which were not included in the scope of the Vermont Yankee IST Program.

Programmatic concerns with other plant programs have been identified in LER's 95-14, 96-02, and 96-04. As a result of the identification of weaknesses in plant programs, a company policy dealing with Vermont Yankee Programs is being developed to clearly define company expectations, structure, responsibilities and authorities relative to company programs.