

LICENSEE EVENT REPORT (LER)

Facility Name (1)

Byron, Unit 1

Docket Number (2)

0 | 5 | 0 | 0 | 0 | 4 | 5 | 4 | 1 | of | 0 | 3

Page (3)

Title (4)

FAILURE TO PERFORM ASME SECTION XI TESTING

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)					
1	0	3	1	8	4	8	4	0	4	1	2	8	5		0 5 0 0 0 1 1
OPERATING MODE (9)			6			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)									
POWER LEVEL (10)			20.402(b)			20.405(c)			50.73(a)(2)(iv)			73.71(b)			
			20.405(a)(1)(i)			50.36(c)(1)			50.73(a)(2)(v)			73.71(c)			
			20.405(a)(1)(ii)			50.36(c)(2)			50.73(a)(2)(vii)			Other (Specify in			
			20.405(a)(1)(iii)			X 50.73(a)(2)(i)			50.73(a)(2)(viii)(A)			Abstract below an			
			20.405(a)(1)(iv)			50.73(a)(2)(ii)			50.73(a)(2)(viii)(B)			in Text)			
20.405(a)(1)(v)			50.73(a)(2)(iii)			50.73(a)(2)(x)									

LICENSEE CONTACT FOR THIS LER (12)

Name		TELEPHONE NUMBER	
Joel J. Ewald, System Test Engineer		Ext. 605	
AREA CODE		8 1 5 2 3 4 - 5 4 4 1	

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS
A				N					

SUPPLEMENTAL REPORT EXPECTED (14)

Expected Submission Date (15)		Month	Day	Year
Yes (If yes, complete EXPECTED SUBMISSION DATE)		X	NO	

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On March 18, 1985, at 1232 hours with the unit in Mode 5, it was discovered that two seal injection header test connection valves, 1CV066B and 1CV067A, had been returned to service prior to performance of the required inservice inspections. Subsequently, inspections were completed with satisfactory results. Further investigation revealed five (5) similar occurrences affecting the following equipment:

1. 1BR003A - Letdown Reheat heat exchanger drain valve.
2. 1SI8948B - Safety Injection accumulator primary check valve.
3. 1FW017D - Feedwater chemical feed connection check valve.
4. 1RH030A - Residual Heat Removal inlet low point drain valve.
5. QAB01PA - Recycle Evaporator Feed Pump.

Again, subsequent inspections were completed with satisfactory results, with the exception of the 1FW017D valve which has been isolated from service. These events were caused by failures to follow approved procedures for removing and returning equipment out-of-service and processing nuclear work requests. To prevent reoccurrence, the method of processing safety related work requests and expediting testing requirements has been reviewed and revised. Also, memos have been issued to the Shift Personnel to clarify the procedural intent of processing work requests and removing and returning equipment out-of-service. Finally the Quality Control Department has attended training on verifying that the ISI group has specified testing requirements on safety related work requests.

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TEXT

On March 18, 1985, at 1232 hours with the unit in Mode 5, it was discovered that two seal injection header test connection valves, 1CV066B and 1CV067A, repaired and replaced respectively, had been returned to service prior to performance of the required inservice inspections. Per Section XI of the ASME Boiler and Pressure Vessel Code, which is referenced by Technical Specification 3/4.4.10, repairs to an ASME Code component require a visual examination, VT-2, for leakage prior to returning the component to service.

On October 30, 1984, the Quality Control (QC) Department released the work packages for valves 1CV066B and 1CV067A for test, to the Operating Department. The Operating Department forwarded the work packages to the Technical Staff Engineer responsible for the Chemical and Volume Control (CV) system, where the packages were unaccountably tabled until March 18, 1985. Previously on October 13, 1984, the Operating Department returned valves 1CV066B and 1CV067A to service, prior to the required test completion. On March 18, 1985, at 1656 hours, inservice inspection (ISI) surveillance 1BVS 4.10-4, "Visual Examination (VT-2) of Class 2 Components" was completed for valves 1CV066B and 1CV067A with satisfactory results.

The root cause of the this event was failure to follow approved procedures. Valves 1CV066B and 1CV067A were returned to service on October 13, 1984 by the Operating Department. This was contrary to the procedural requirement to not return equipment to service until the "Tests Complete" block of the referenced work request has been signed.

Further investigation into this event revealed five (5) similar occurrences involving safety related work packages with pending inservice inspections.

1. The work package for the letdown reheat heat exchanger drain valve, 1BRO03A, was forwarded to Operating on October 4, 1984, for completion of testing requirements. Operating then forwarded the package to the Technical Staff Engineer responsible for the Boron Thermal Regeneration (BR) system for testing, where the work package was unaccountably tabled until March 26, 1985. Previously, on October 2, 1984, the Operating Department returned valve 1BRO03A to service, prior to the required test completion. On March 28, 1985, at 1656 hours, ISI surveillance 1BVS 4.10-5, "Visual Examination (VT-2) of Class 3 Components", was completed for valve 1BRO03A with satisfactory results.

The root cause of this event was a failure to follow approved procedures. Valve 1BRO03A was returned to service prior to the "Tests Complete" block signature, which is contradictory to procedural requirements.

2. The work package for the safety injection accumulator primary check valve, 1SI8948B was forwarded to Operating on October 20, 1984 for completion of testing requirements. Operating signed the "Work Complete" on October 22, 1984 with the "Tests Complete" block marked N/A. The test required section of the work request specified an ISI Pressure Test, which was initialed October 3, 1984. On January 15, 1985 at 2131 hours, ISI surveillance 1BVS 4.10-3, "Visual Examination (VT-2) of Class 1 Components", was completed for the Class 1 pressure boundary, including valve 1SI8948B with satisfactory results.

The root cause of this event was a failure to follow approved procedures. The Operating Department signed "Work Complete" of the work request indicating satisfactory completion of testing requirements without a signature for the required ISI test.

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TEXT

- The work package for feedwater chemical feed connection check valve, 1FW017D, was forwarded to Operating on October 29, 1984 for completion of testing requirements. Operating then forwarded the package to the Technical Staff Engineer responsible for the Feedwater (FW) system for testing, who erroneously signed for tests complete on December 10, 1984. However, the Operating Department returned the valve to service on October 13, 1984, prior to the required test completion. Valve 1FW017D has again been isolated from service and is awaiting proper plant conditions for completion of the required ISI test.

The root cause of this event was a failure to follow approved procedures. Valve 1FW017D was returned to service prior to the "Tests Complete" block signature, which is contradictory to procedural requirements.

- The work package for the residual heat removal inlet low point drain valve, 1RH030A (formerly 1ZZ291V), was forwarded to Operating on October 30, 1984 for completion of testing requirements. Operating then signed "Tests Complete" on November 10, 1984 and "Work Complete" on November 12, 1984, prior to completion of the specified ISI pressure test. Previously, on October 14, 1984, the Operating Department returned valve 1RH030A to service, prior to completion of the required test. On March 28, 1985, at 1246 hours, ISI surveillance 1BVS 4.10-4 was completed for valve 1RH030A with satisfactory results.

The root cause of this event was a failure to follow approved procedures. Valve 1RH030A was returned to service prior to the "Test Complete" block of the work request being signed off, which is contradictory to procedural requirements. Also, the work package was signed "Complete" by Operating without a signature indicating completion of the specified ISI test.

- The work package for the recycle evaporator feed pump, OAB01PA, was initiated off-hours and not routed through the routine processing methods. The necessary ISI test, therefore, was not specified on the work request. The Maintenance Department signed as complete on February 13, 1985. The Operating Department completed the specified tests on February 13, 1985 and signed "Work Complete" on February 14, 1985. On April 1, 1985, at 0946 hours, ISI surveillance 1BVS 4.10-5 was completed for pump OAB01PA with satisfactory results.

The root cause of this event was failure to follow approved procedures. The Quality Control Department released the work package for test without an ISI test requirement determination. Quality Control was unaware of the interpretation of the procedure revision.

To prevent reoccurrence of these events, the following preventative measures have been taken:

- Work requests, when received by the Operating Department following "QC Release" for testing, are not to leave the control room until testing requirements are complete. In addition, copies of work requests with pending testing requirements are being forwarded to the appropriate departments by Operating to assure completion in a timely manner.
- A memo has been issued to the Shift Personnel to clarify the procedural intent of processing work requests and removing and returning equipment out-of-service. Another memo has also been issued to clarify the method of expediting inservice inspection testing requirements and who can perform those requirements.
- The Quality Control Department has attended a documented training session on verifying that the ISI group has specified testing requirements on safety related work requests.

The performance of the required ISI surveillances with satisfactory results indicates that there was no effect on the plant nor the public safety as a result of these events.

Previous Occurrences: None