GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775

AREA CODE 504 635 6094 344 8651

September 30, 1992

RBG- 37544
File Nos. G9.5, G9.25.1.3

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

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458

Please find enclosed Licensee Event Report No. 92-009, Revision 1, for River Bend Station -Unit 1. This report is submitted pursuant 10CFR50.73.

Sincerely,

W.H. Odell
Manager - Oversight
River Bend Nuclear Group

LAE/PDG/FRC/JRH/CWW/JLB/DCH/kvm

660091

cc: U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

NRC Resident Inspector
P.O. Box 1051
St. Francisville, LA 70775

INPO Records Center
1100 Circle 75 Parkway
Atlanta, GA 30339-3064

Mr. C.R. Oberg
Public Utility Commission of Texas
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Austin, TX 78757

Louisiana Department of Environmental Quality
Radiation Protection Division
P.O. Box 82135
Baton Rouge, LA 70884-2135
ATTN: Administrator

NRC FORM 366 (5-92) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 5/31/95

ESTIMATED BURDEN PER RESPONSE TO COMPLY 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.

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
RIVER BEND STATION	05000 458	1 OF 4

TITLE (4): DISCREPANCY IN TECHNICAL SPECIFICATION LED TO FAILURE TO PROPERLY PERFORM SURVEILLANCES TESTS

EVENT DATE (5)			LER NUMBER (6)			REPORT NUMBER (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
										05000
06	18	92	92	009	01	09	30	92	FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)	5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)			
POWER LEVEL (10)	0	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
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	(Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
L.A. ENGLAND - DIRECTOR, NUCLEAR LICENSING	(504) 381-4145

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
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On June 18, 1992, GSU determined that a discrepancy in Technical Specification (TS) 3.6.1.3, Table 3.6.1.3-1 resulted in the non-performance of required surveillance tests for valves 1SSR*SOV133, SOV134, SOV140, and 1SSR*V706. These valves are located in the post-accident sampling system (PASS) panel supply and return lines. The TS table included the penetrations for the containment atmosphere and monitoring system (CMS) 'A' hydrogen analyzer supply and return lines. However, the penetrations for the CMS 'B' hydrogen analyzer and PASS lines should have been included instead of the CMS 'A' lines because of the presence of non-safety-related piping in the PASS lines which branch off the CMS 'B' lines outside containment. This was caused by an inadequate flow diagram drawing which misdirected the document reviewer to select analyzer A penetrations instead of the analyzer B penetrations.

Corrective actions include revision to the flow diagram, revisions to the technical specifications and surveillance test procedures, and the performance of leak tests on the subject valves. A safety assessment concludes that the standby gas treatment system was available to provide filtration in the event of a loss of coolant accident coincident with a seismic event.

REQUIRED NUMBER OF DIGITS/CHARACTERS
FOR EACH BLOCK

BLOCK NUMBER	NUMBER OF DIGITS/CHARACTERS	TITLE
1	UP TO 46	FACILITY NAME
2	8 TOTAL 3 IN ADDITION TO 05000	DOCKET NUMBER
3	VARIES	PAGE NUMBER
4	UP TO 76	TITLE
5	6 TOTAL 2 PER BLOCK	EVENT DATE
6	7 TOTAL 2 FOR YEAR 3 FOR SEQUENTIAL NUMBER 2 FOR REVISION NUMBER	LER NUMBER
7	6 TOTAL 2 PER BLOCK	REPORT DATE
8	UP TO 18 -- FACILITY NAME 8 TOTAL -- DOCKET NUMBER 3 IN ADDITION TO 05000	OTHER FACILITIES INVOLVED
9	1	OPERATING MODE
10	3	POWER LEVEL
11	1 CHECK BOX THAT APPLIES	REQUIREMENTS OF 10 CFR
12	UP TO 50 FOR NAME 14 FOR TELEPHONE	LICENSEE CONTACT
13	CAUSE VARIES 2 FOR SYSTEM 4 FOR COMPONENT 4 FOR MANUFACTURER NPRDS VARIES	EACH COMPONENT FAILURE
14	1 CHECK BOX THAT APPLIES	SUPPLEMENTAL REPORT EXPECTED
15	6 TOTAL 2 PER BLOCK	EXPECTED SUBMISSION DATE

REPORTED CONDITION

On June 18, 1992, GSU determined that a discrepancy in Technical Specification (TS) 3.6.1.3, Table 3.6.1.3-1 resulted in the non-performance of required surveillance tests for valves (*ISV*) 1SSR*SOV133, SOV134, SOV140, and 1SSR*V706. These valves are located in the post-accident sampling system (*IP*) (PASS) panel supply and return lines. The TS table included the penetrations for the containment atmosphere and monitoring system (*BB*) (CMS) 'A' hydrogen analyzer supply and return lines. However, the penetrations for the CMS 'B' hydrogen analyzer and PASS lines should have been included instead of the CMS 'A' lines because of the presence of non-safety-related piping in the PASS lines which branch off the CMS 'B' lines outside containment. This condition created an annulus bypass leakage path. As a result of this discrepancy, the valves referenced above have not received the surveillance tests required by TS 4.6.1.3. Therefore, this event is reportable pursuant to 10CFR50.73(a)(2)(i)(B) as operation prohibited by the TS.

INVESTIGATION

Annulus bypass leakage is limited by TS 3.6.1.3.d, to the following:

> A combined leakage rate of less than or equal to 13,500 cc/hr for all penetrations shown in Table 3.6.1.3-1 as annulus bypass leakage paths when pressurized to Pa (accident pressure), 7.6 psig.

Condition report (CR) 92-0280 was issued to document a discrepancy with respect to containment penetrations serving CMS lines. The penetrations (1KJB*Z605E and F) for the CMS 'A' hydrogen analyzer supply and return lines (valves (*ISV*) 1CMS*SOV31A and 35C for 1KJB*Z605E and 1CMS*SOV31C and 35A for 1KJB*Z605F) are included in TS Table 3.6.1.3-1. However, penetrations 1KJB*Z601E and F are not included in TS Table 3.6.1.3-1. These penetrations serve the CMS 'B' hydrogen analyzer and post-accident sampling system (PASS) panel supply and return lines. Valves 1CMS*SOV35D, 31B, 1SSR*SOV133 and 134 isolate penetration 1KJB*Z601E and 1CMS*SOV35B, 35D, 1SSR*V706, and 1SSR*SOV140 isolate penetration 1KJB*Z601F. Figure 1 shows the penetrations with the valves indicated. The discrepancy identified in the CR was that the CMS 'A' lines, which were listed in the TS, did not meet the criteria for inclusion in the TS due to the fact that all of the piping was ASME class 2 (safety-related). However, the PASS panel supply and return lines include class 4 piping. This piping is non-safety-related and thus it should have been included in the TS.

Initially the investigation focused on the containment isolation valves (*ISV*) (the CMS valves). GSU evaluated the as-left leak rate test histories of valves 1CMS*SOV35D, 31B, 35B, and 31D, and found the as-left leakage data to be within the allowables of TS 3.6.1.3. This led to the preliminary conclusion that this condition was not reportable. However, further investigation revealed that an annulus bypass leakage path was created due to the presence of the non-safety-related piping in the PASS panel piping supply and return lines.

It was then found that valves 1SSR*SOV133, SOV134, SOV140 and V706 have been stroke tested but not leak tested. Thus, GSU determined that a reportable condition (ie., failure to perform surveiliances on the valves) existed.

ROOT CAUSE

The hydrogen analyzer A and B penetration appear as identical piping loops on the containment monitoring system (CMS) flow diagrams (FSKs). The flow diagram fundamental FSK 33-2.0 incorrectly directs the reviewer to FSK 33-2B (analyzer A) for the PASS interface; whereas the interface is actually shown on FSK 33-2D (analyzer B). Therefore, GSU concludes that during the TS development, the reviewer was misdirected into selecting the analyzer A penetrations instead of the analyzer B penetrations.

CORRECTIVE ACTION

The corrective actions initially identified through the evaluation of the subject condition are updated as follows:

1. Surveillance Test Procedure (STP) 610-3827 ("Reactor Plant Sampling Valve Leak Rate Test") has been revised to include testing of 1SSR*SOV133, SOV134, SOV140, V706 and baseline data has been compiled. STP-552-3823 ("Containment Atmosphere and Leakage Monitoring Valve Leak Rate Test") will be revised to change the TS allowable value for 1CMS*SOV31A & C, 1CMS*SOV35A & C, when the TS change discussed below is approved. STPs 057-3800 ("Local Leak Rate Tests") and 057-3900 ("LLRT Non-Refueling Summation") will be revised to include the SSR valve data after the TS change is approved.

2. During RF-4, leak rate tests were completed on the subject SSR valves.

3. The flow diagram fundamental FSK 33-2.0 has been revised via document change notice (DCN #92-0365) to correctly reflect the analyzer penetrations.

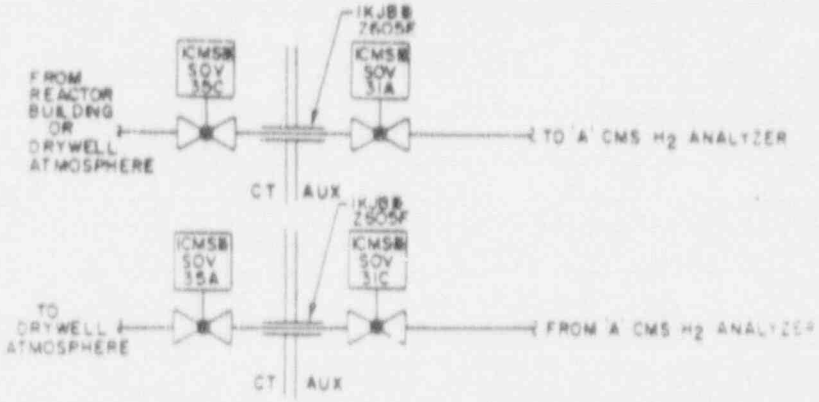
4. A T/S change request will be prepared to correct Section 3.6.1.3. The USAR will be revised, as necessary, to ensure agreement with the revised T/S.

SAFETY ASSESSMENT

The annulus bypass leakage pathway identified above discharges into another part of secondary containment. While the annulus could have been bypassed, the standby gas treatment system was available to provide filtration in the event of a loss of coolant accident (LOCA) coincident with a seismic event.

NOTE: (**) Indicates System or Component Codes.

DIV I CMS HYDROGEN ANALYZER PENETRATIONS
1KJB*Z605E & F



DIV II CMS HYDROGEN ANALYZER PENETRATIONS
1KJB*Z601E & F

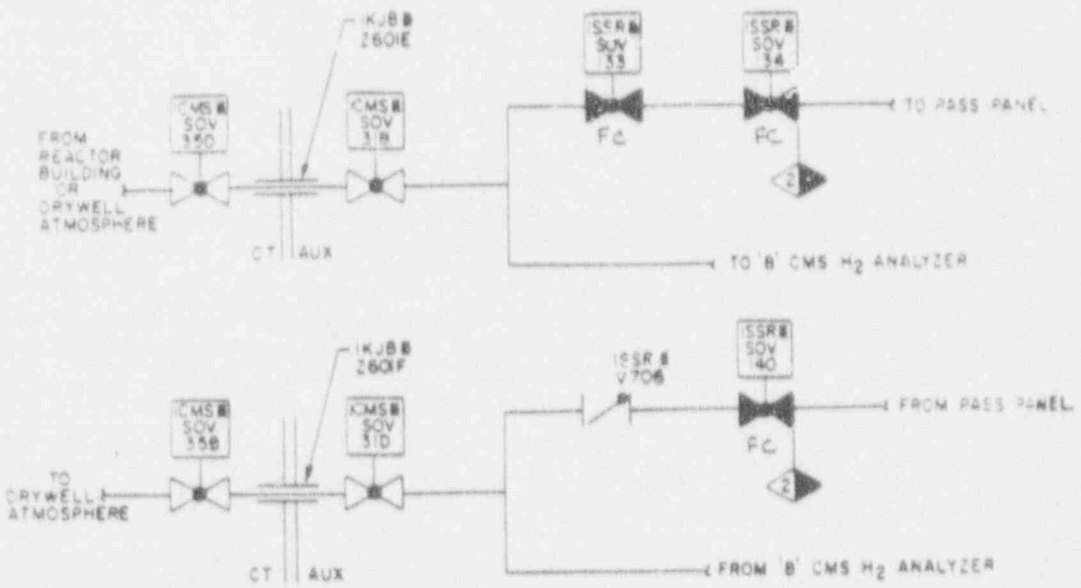


FIGURE 1