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NYN-92166

December 11, 1992

United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

Reference: Facility Operating License No. NPF-86, Docket No. 50-443

Subject: Licensee Event Report (LER) No. 92-023-00: Missed Technical Specification  
Surveillances

Gentlemen:

Enclosed please find Licensee Event Report (LER) No. 92-023-00 for Seabrook Station. This submittal documents two events which were identified on November 12, 1992 and November 16, 1992 and are being reported pursuant to 10 CFR 50.73(a)(2)(i)(B).

Should you require further information regarding this matter, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 474-9521, extension 3772.

Very truly yours,

  
Ted C. Feigenbaum

TCF:MJM/tad

Enclosures: NRC Forms 366, 366A

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December 11, 1992  
Page two

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## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)										DOCKET NUMBER (2)										PAGE (3)																															
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TITLE (4)																																																			
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Mr. James M. Peschel, Regulatory Compliance Manager, ext. 3772																				6 0 3 4 7 4 - 9 5 2 1																															
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ABSTRACT (Limit to 1400 characters. Use approximately fifteen single space typewritten lines) (16)																																																			
<p>On November 12 and 16, 1992 North Atlantic Energy Service Corporation (North Atlantic) identified that three safety related components which are within the scope of the Inservice Testing Program (IST) were not tested as required by the program prior to entry into Mode 4 at the completion of the second refueling outage. Failure to complete this testing in accordance with the IST program represents a failure to comply with Technical Specification 4.0.5 which requires inservice testing be performed pursuant to section XI of the ASME Boiler and Pressure Vessel Code for Class 1, 2, and 3 components. The IST program delineates the specific implementation details of ASME Section XI testing and is an NRC reviewed and approved document.</p> <p>On November 12, 1992 North Atlantic identified a missed Inservice Test (IST) of the check valves in the Instrument Air [LD] piping which isolate the non-safety compressed air system from the backup air cylinders for the Primary Component Cooling Water (PCCW) [CC] temperature control valves and temperature control bypass valves. The plant was in Mode 2 when this condition was identified. The check valves have since been tested with satisfactory results. On November 16, 1992 North Atlantic identified another missed inservice test of the isolation valve for one of the four safety injection accumulators. The plant was in Mode 1 when this missed test was identified. The valve was subsequently stroke tested with satisfactory results.</p> <p>There were no adverse safety consequences associated with this event. Redundant backup air supply isolation check valves are provided for each PCCW Temperature Control valve. The open and close times for the accumulator isolation valves are not critical values.</p>																																																			

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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SEABROOK STATION

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DESCRIPTION OF EVENT

On November 12, 1992 North Atlantic identified that while the required Inservice Testing of the Primary Component Cooling Water (PCCW) system was performed, the portion of the PCCW valve surveillance test which verifies the Instrument Air check valves to the backup air supply cylinders had not been performed. It was also identified at this time that the Inservice Testing of these check valves was inadvertently designated in the implementing procedure as being required only during cold shutdown instead of each quarter. On November 16, 1992 North Atlantic identified that the required surveillance for Safety Injection (SI) accumulator isolation valve SI-V3 had not been performed prior to entering Mode 3. The required Inservice Testing had been performed on the other three accumulator isolation valves during the refueling outage. The plant entered Mode 2 on November 12, 1992, and was in Mode 1 when the missed surveillance of SI-V3 was identified.

Inservice Testing which verifies valve position indication, status lights and stroke times of various PCCW valves is performed in accordance with procedure OX1412.11, "PCCW System Cold Shutdown Valve Test". Included in this procedure is the open and close exercise of the Instrument Air backup air supply isolation check valves, IA-V8030, IA-V8031, IA-V8032, and IA-V8033. These check valves are in the piping between Instrument Air Loop A and Loop B and the backup air supply cylinders which provide safety grade air to the PCCW Temperature Control Valves and PCCW Temperature Control Bypass Valves. The IST Program requires these check valves to be tested quarterly. However, prior to the second refueling outage these check valves have been tested only once, in September 1991 during the first refueling outage.

The surveillance testing performed per procedure OX1412.11 during the second refueling outage failed when two PCCW valves exceeded their required stroke time limits. The instrument air check valves were not tested at this time since the effects of any repairs on the remainder of the testing was unknown. The valves which initially failed were repaired and successfully tested. However, the instrument air check valves were not included in this partial surveillance.

While the Compressed Air Supply and Distribution System is a nonsafety class system, the backup air supply systems are ANSI Safety Class 3. Tubing and valves in the backup air supply system were designed to ANSI B31.1. These valves were included in the Inservice Test Program (IST) in response to Generic Letter 89-04 (Guidance on Developing Acceptable Inservice Testing Programs).

Inservice Testing which verifies the operability of various SI accumulator isolation valves is performed in accordance with procedure OX1405.12, "SI Accumulator Cold Shutdown Valve Test". Included in this procedure is accumulator isolation valve SI-V3. OX1405.12 verifies that the stroke times of these valves are within the times specified in OX1456.81, "Operability Testing of IST Valves", and that the remote position indication for each valve accurately indicates the valve position. SI-V3 is an ASME Code Class 2 valve which is required to be open with power removed when in Modes 1, 2, and 3 per Technical Specification 3.5.1.

SI-V3, IA-V8030, IA-V8031, IA-V8032, and IA-V8033 were recently incorporated into the IST Program in response to Generic Letter 89-04. The instrument air check valves were incorporated on March 11, 1991 and the SI accumulator isolation valves were incorporated

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (5)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
SEABROOK STATION	0 5 0 0 0 4 4 3	9 2	— 0 2 3	— 0 0	0 3	OF	0 4

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on January 31, 1992.. These valves were tested prior to the second refueling outage on September 23, 1991 and September 18, 1991 respectively.

The IST Program Plan designates the SI accumulator isolation valves as Cold Shutdown frequency components and the PCCW backup air supply check valves as quarterly components. These components and their associated test methods were incorporated into Station surveillance procedures. However, the backup air supply check valves were inappropriately designated as cold shutdown frequency components. These valves will be incorporated in the applicable PCCW valve quarterly surveillance procedure (OX1412.01 and OX1412.02 for PCCW Loop A and Loop B, respectively).

### SAFETY CONSEQUENCES

Instrument Air check valves IA-V8030, IA-V8031, IA-V8032, and IA-V8033 isolate the backup air supply cylinders from the compressed air system in the event the compressed air system is depressurized. The purpose of this backup air is to provide continued control of the PCCW temperature control valves and temperature control bypass valves. Credit for the nonsafety compressed air system is not taken in the plant accident analysis. There are two isolation check valves in the line between the backup air cylinders and the compressed air system for each loop to provide redundant protection. In addition, after this condition was identified, the required Inservice Testing was performed on these check valves with satisfactory results.

In the case of the accumulator isolation valve (SI-V3), the open and close stroke times are non-critical values. Limiting close and open times listed in OX1456.81 for SI-V3 serve as limits for the purpose of identifying a degradation in valve/operator performance. This valve was stroked open and closed with the accumulator depressurized in early November to confirm valve position indication. Any gross problems with the valve would have been detected at that time. In addition, after this condition was identified, SI-V3 was stroke tested closed with satisfactory results.

### ROOT CAUSE

The root cause of missing the Inservice Test of the Instrument Air check valves has been identified as personnel error. The original surveillance was not annotated to indicate that it was a partial surveillance. If it had been so annotated the retest coordinator or Work Control Supervisor would have been alerted to the fact that the surveillance was to be performed for more than just a retest of the failed valves.

The root cause of missing the Inservice Test of the SI accumulator isolation valve and for not testing the Instrument Air check valves each quarter has been identified as a procedure error. The test of the SI accumulator isolation valves should have been coded as being required for Cold Shutdown. However, it was erroneously coded as an event driven surveillance. Had it been properly coded existing programs would have identified this surveillance on the Mode 5 to Mode 4 checklist. In regard to the incorrect surveillance frequency, the backup air check valve testing was inappropriately identified as a cold shutdown test instead of a quarterly test at the time this requirement was incorporated in a Station Procedure.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (8)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
SEABROOK STATION	0 5 0 0 0 4 4 3 9 2	—	0 2 3	—	0 0 0 4	OF 0 4

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CORRECTIVE ACTIONS

1. The Inservice tests of Instrument Air check valves IA-V8030, IA-V8031, IA-V8032, IA-V8033 and SI accumulator isolation valve SI-V3 were performed on the same day it was identified that they had been missed (November 12 and 16, 1992, respectively). All valves were tested satisfactorily.
2. Testing of the Instrument Air check valves will be moved to the Station Procedures for performing quarterly valve operability tests (OX1412.01 and OX1412.02 for Loop A and Loop B, respectively). This is expected to be completed by January 30, 1993.
3. The Inservice Testing of the SI accumulator isolation valves will be coded as cold shutdown surveillances. This is expected to be completed by March 31, 1993.
4. Proper documentation of partially completed RTS's will be stressed to operators and retest personnel during the first phase of 1993 requalification training. This is expected to be completed by March 1, 1993.
5. "Partial RTS" stamps will be provided to make it easier to identify partial surveillances. This is expected to be completed by January 30, 1993.
6. The method for writing/changing RTS's when procedures are written or revised will be reviewed and appropriate changes made. This is expected to be completed by June 30, 1993.
7. The method for writing/changing RTS's when procedures are changed will be reviewed. This is expected to be completed by June 30, 1993.
8. North Atlantic will investigate adding a screen to the Action Statement Tracking program to provide a list of required surveillances when entering an action statement. This is expected to be completed by June 30, 1993.
9. The method of identifying procedure changes to the section XI testing program will be reviewed and appropriate changes made. This is expected to be completed by June 30, 1992.

PLANT CONDITIONS

The plant was in Mode 2 when the missed Inservice Test of the Instrument Air check valves was identified, and in Mode 1 when the missed Inservice Test of the Safety Injection accumulator isolation valve was identified. Post outage testing was being performed during the period between when the inservice tests were required to be performed and when the condition was identified.

North Atlantic has reported other instances where Technical Specification Surveillance requirements were missed in Licensee Event Reports 92-003-00 and 92-014-00.