YANKEE ATOMIC ELECTRIC COMPANY

Telephone (413) 424-5261

Star Route, Rowe, Massachusetts 01367

June 21, 1985

U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attention: Dr. Thomas E. Murley, Regional Administrator

Subject: Licensee Event Report 50-29/85-02

CS-V-621 Not Tested in Accordance with the ISI Program

Dear Sir:

In accordance with 10 CFR 50.73(a)(2)(i), the attached Licensee Event Report is hereby submitted.

Very truly yours,

Normand N St Laurent

Normand N. St. Laurent
Plant Superintendent

DWE/nm
Enclosure

cc: [3] NSARC Chairman (YAEC)
[1] Institute of Nuclear Power Operations (INPO)

IE: 22
1/1

NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/85

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Yankee Nuclear Power Station	0 5 0 0 0 0 2 9	1 OF 0 2

TITLE (4)
CS-V-621 Not Tested in Accordance with the ISI 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	2 4	8 5	8 5	0 0 2	0 0	0 6	2 3	8 5		0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9): 1
POWER LEVEL (10): 1 0 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

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 Abstract below and in Text, NRC Form 366A)
20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
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
Douglas W. Ellis, Plant Engineer	AREA CODE 4 1 3 4 2 4 - 5 2 6 1

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 fifteen single-space typewritten lines) (16)

On May 24, 1985 while operating in Mode 1 at 100 percent thermal power, an inadequacy of an Inservice Inspection (ISI) Program implementing procedure was identified. The inadequacy concerned the frequency and method of testing a containment isolation check valve, CS-V-621. The procedure as performed quarterly did not demonstrate a positive stroke (closed position) of the valve. ASME Section XI permits stroke testing quarterly or during cold shutdown (refueling). A positive stroke of CS-V-621 is not practical during plant operation due to system configuration and Technical Specifications (TS) operability requirements for the Safety Injection System. This procedural inadequacy did not properly implement T.S. 4.0.5 and is the result of personnel error during ISI Program development. Corrective Actions included a review to determine if any similar inadequacies in related valve surveillance procedures existed. The review determined that two additional check valves, located in a separate system, could not be positively stroke tested during plant operation. Corrective Actions to prevent recurrence will include appropriate revisions to the ISI Program and implementing procedures to correctly indicate testing of the check valves during cold shutdown (refueling) in accordance with ASME Section XI requirements. The importance of adequate review of all T.S. implementing procedures will be stressed to all appropriate plant personnel. The ISI program will be revised by 12/31/85 and the ISI implementing procedures will be revised prior to their use for ISI exercising of these valves.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Yankee Nuclear Power Station	0 5 0 0 0 0 2 9	8 5	— 0 0 2	— 0 0	0 2 OF 0 2

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

On May 24, 1985 while operating in Mode 1 at 100 percent thermal power, an inadequacy of an Inservice Inspection (ISI) Program implementing procedure was identified. The inadequacy concerned the frequency and method of testing a containment isolation check valve, CS-V-621.

The ASME Section XI requirements permit testing of this valve quarterly or during cold shutdown (refueling). The ISI Program and implementing procedure required a quarterly stroke test of this valve, however this was not being accomplished during the testing. The piping and valve arrangement is such that CS-V-621 is located in series with check valves upstream and downstream of it. The procedure, as performed quarterly, did not demonstrate a positive stroke of CS-V-621. The procedure did, however, demonstrate positive stroke of one of the check valves in series with CS-V-621. Further, it is not practical to stroke this valve quarterly during plant operation due to system configuration and Technical Specifications (T.S.) operability requirements for the Safety Injection System. However, the valve has been stroked during the 1984 refueling outage during a system pre-op test.

The procedural inadequacy did not properly implement the T.S. 4.0.5 requirements to accomplish Inservice Inspection and testing surveillances and is the result of personnel error during development of the ISI Program.

Corrective Actions taken have included a review of the ISI Program and implementing procedures to determine whether a similar valve configuration and resulting methodology existed elsewhere in the Program. The review determined that similar stroking methodology did exist for two Emergency Boiler Feed check valves, EBF-V-813 and 819. The ISI Program requires a quarterly stroke of EBF-V-813 and 819. The procedure used did not demonstrate a positive stroke of these valves. Further investigation however had determined that these valves had been stroked during the prior refueling outage during system flow testing. As in the previous case, stroking of these valves is impractical during plant operation. Similarly, this inadequacy is also the result of personnel error during development of the ISI Program.

There are no significant safety consequences or implications involved since CS-V-621, and EBF-V-813 and 819 were stroked during the 1984 refueling outage.

Corrective Actions planned to prevent recurrence include appropriate revisions of the ISI Program and implementing procedures. The revision(s) will correctly indicate stroking of CS-V-621, EBF-V-813 and 819 on a cold shutdown (refueling) basis. This action is in accordance with ASME Section XI requirements and will correct the procedural deficiency. The ISI program will be revised by 12/31/85 and the ISI implementing procedures will be revised prior to their use for ISI exercising of these valves. The importance of an adequate review of all program Technical Specification implementing procedures will be stressed to all appropriate plant personnel.

There have been no previous Licensee Event Reports of this nature.