

## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Three Mile Island Unit 2										DOCKET NUMBER (2) 0 5 0 0 0 3 2 0 1 OF 0 5					PAGE (3) 1 OF 0 5	
TITLE (4) Administrative Non-Compliance with Technical Specification 3.6.1.1																
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 4	1	3 8 4	8 5	0 0 7	0 0	0 7	8 5						0 5 0 0 0			
			0 5 0 0 0													
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (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 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)(ix)					
LICENSEE CONTACT FOR THIS LER (12)																
NAME Russell D. Wells, TMI-2 Licensing Engineer										TELEPHONE NUMBER 7 1 7 9 4 8 - 8 2 4 4						
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC						
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)												<input checked="" type="checkbox"/> NO				

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

On July 2, 1985, during a review of an Incident Event Report, GPU Nuclear discovered that containment isolation valve FS-V-639 had been routinely opened since April 13, 1984, without an NRC-approved procedure. FS-V-639 had previously been allowed opened during entries involving cutting, welding, burning, etc., in accordance with NRC-approved Procedure 4300-ADM-3240.1, "Access To and Work In the Containment Building". On April 13, 1984, this procedure was converted to 4000-ADM-3240.01. During this conversion, the section which permitted FS-V-639 to be opened was inadvertently deleted. Thus, from April 13, 1984, to July 2, 1985, FS-V-639 was routinely opened without an NRC-approved procedure. This condition constitutes non-compliance with Technical Specification 3.6.1.1, and is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B).

This LER is similar in nature to LER 85-06.

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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104  
EXPIRES 8/31/85

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			

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

I. PLANT OPERATING CONDITIONS BEFORE THE EVENT

The TMI-2 facility is in a long-term cold shutdown state. The reactor decay heat was being removed via loss to ambient. Throughout this event there was no effect on the Reactor Coolant System or the core.

II. STATUS OF STRUCTURES, COMPONENTS, OR SYSTEMS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

N/A

III. EVENT DESCRIPTION

On July 2, 1985, during a review of an Incident Event Report, GPU Nuclear discovered that containment isolation valve FS-V-639 (IEEE Code-JM) had been routinely opened since April 13, 1984, without an NRC-approved procedure.

TMI-2 Technical Specification 3.6.1.1, "Containment Integrity" requires that "Primary Containment Integrity shall be maintained unless it is not required per procedures approved pursuant to Specification 6.8.2." Technical Specification 6.8.2 requires, in part, NRC approval.

Thus, this event was determined to be reportable, pursuant to 10 CFR 50.73(a)(2)(i)(B), due to a condition prohibited by the plant's Technical Specifications. The event description is provided below.

FS-V-639 is the outside containment isolation valve for penetration R-548 in the TMI-2 Fire Protection System (IEEE Code-ICP). This valve isolates the supply to the fire hose stations in the Reactor Building. FS-V-639 is normally locked closed in accordance with TMI-2 Operating Procedure 4210-OPS-3810.01, "Fire Protection System".

On May 4, 1982, TMI-2 Administrative Procedure 4300-ADM-3240.1, "Access To and Work In the Containment Building", was issued. This procedure, which received NRC-approval, permitted the opening of FS-V-639 during entries requiring cutting, welding, burning, etc.

On September 14, 1982, revision 9 of TMI-2 Surveillance Procedure 4301-M8, "Containment Integrity Verification", was issued. This revision added a reference to 4300-ADM-3240.1 as the administrative controlling procedure for opening FS-V-639.

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On April 13, 1984, procedure 4300-ADM-3240.1 was converted to Administrative Procedure 4000-ADM-3240.01, "Access To and Work In the Containment Building". During this conversion, the section which permitted the opening of FS-V-639 was deleted. However, Operating Procedure 4210-OPS-3810.01 was not revised to incorporate the deleted section from 4300-ADM-3240.1.

Thus, from April 13, 1984, to July 2, 1985, i.e., the discovery date of this event, FS-V-639 was routinely opened during operations involving cutting, welding, burning, etc., without an NRC-approved procedure.

This event is similar to Licensee Event Report (LER) 85-06 which also documented an administrative non-compliance with Technical Specification 3.6.1.1.

Note that although the event date of this LER is April 13, 1984, the discovery date is July 2, 1985. Therefore, the due date of this LER is August 1, 1985, that is, 30 days from July 2, 1985.

#### IV. ROOT CAUSE OF THE EVENT

The root cause of this event was personnel error during the conversion of Procedure 4300-ADM-3240.1 to 4000-ADM-3240.01. As a result of this procedure conversion, the section which permitted the opening of FS-V-639 was deleted. Additionally, Operating Procedure 4210-OPS-3810.01 should have been revised to incorporate the deleted section from 4300-ADM-3240.1. The failure to do so resulted in the absence of an NRC-approved procedure permitting FS-V-639 to be opened.

Two contributing causes of this event are:

- o The acceptance criteria for 4301-M8 states, "If valve is allowed open under administrative controls, verify that the operating procedure which required the valve to be open is current and approved per Technical Specification 6.8.2". On March 18, 1985, during the performance of this surveillance procedure, FS-V-639 was initialed as being in the opened position. The operator, however, failed to perform the requirements of the above stated acceptance criteria. By doing so, he would have discovered that Surveillance Procedure 4301-M8 incorrectly referenced 4300-ADM-3240.1 as the administrative controlling procedure for FS-V-639.
- o In April of this year, TMI-2 Plant Operations personnel performed a review of the administrative controlling procedures listed in 4301-M8. The intent of this review was to verify that those procedures listed in 4301-M8 were

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TEXT (If more space is required, use additional NRC Form 386A's) (17)

correct and had received NRC-approval. The Plant Operations' review, however, also failed to detect that Surveillance Procedure 4301-M8 referenced the incorrect administrative controlling procedure for allowing FS-V-639 to be opened.

V. CORRECTIVE ACTIONS PLANNEDShort Term

A Temporary Change Notice (TCN) to TMI-2 Operating Procedure 4210-OPS-3810.01 was issued on July 8, 1985, to permit FS-V-639 to be open as previously allowed. Additionally, a TCN to TMI-2 Surveillance Procedure 4210-SUR-3244.01 (previously 4301-M8) was issued on July 17, 1985, to reference 4210-OPS-3810.01 as the correct administrative controlling procedure for FS-V-639. Both TCN's were approved by the NRC. Procedure Change Requests have been submitted to permanently incorporate the above TCN's.

Long Term

An independent review will be performed of the administrative controlling procedures listed in Surveillance Procedure 4210-OPS-3810.01. This review will determine if any similar type discrepancies exist. If any discrepancies are found, they will be corrected.

VI. COMPONENT FAILURE DATA

N/A

VII. AUTOMATIC OR MANUALLY INITIATED SAFETY SYSTEM RESPONSES

N/A

VIII. ASSESSMENT OF THE SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT

FS-V-639 isolates the supply to the fire hose stations in the Reactor Building. Normally, FS-V-639 is locked closed, and FS-V-640, the inside containment isolation valve, is open, in accordance with Operating Procedure 4210-OPS-3810.01. Table 4.7-1 of the TMI-2 Recovery Operations Plan requires the Reactor Building fire hose stations to be operable prior to initiating operations involving cutting, welding, burning, etc. Therefore, when performing these activities, FS-V-639 must be opened in order to pressurize the Reactor Building fire hose stations.



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As previously stated, an NRC-approved procedure did exist which allowed FS-V-639 to be opened during the aforementioned activities. Due to an administrative error, however, this procedure was cancelled.

During the time period of this event, i.e., April 13, 1984, to July 2, 1985, FS-V-639 was opened solely for operations involving cutting, welding, burning, etc. as previously allowed by Procedure 4300-ADM-3240.1. At all other times, FS-V-639 was locked closed in accordance with Operating Procedure 4210-OPS-3810.01. Therefore, this event had no effect on the health and safety of the public.



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July 21, 1985

US Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)  
Operating License No. DPR-73  
Docket No. 50-320  
Licensee Event Report 85-07

Attached is Licensee Event Report 85-07 concerning an administrative non-compliance with TMI-2 Technical Specification 3.6.1.1. This condition was discovered on July 2, 1985.

This event is considered reportable pursuant to Title 10 of the Code of Federal Regulations, Section 50.73(a)(2)(i)(B).

Sincerely,

F. R. Standerfer  
Vice President/Director, TMI-2

FRS/RDW/eml

Attachments

cc: Regional Administrator - Office of I & E, Dr. T. E. Murley  
Program Director - TMI Program Office, Dr. B. J. Snyder  
Deputy Program Director - TMI Program Office, Dr. W. D. Travers