

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1)

Limerick Generating Station
Unit 1

DOCKET NUMBER (2)

050003152

LER NUMBER (3)

YEAR SEQUENTIAL NUMBER REVISION NUMBER

85-047-010

PAGE (3)

02 OF 04

TEXT (17) (MORE SPACE IS REQUIRED, USE ADDITIONAL NRC Form 366A (17))

Description of the Event:

On April 20, 1985 while performing maintenance work on the excess flow check valve (XV-51-103D) in LPCI differential pressure instrument piping, the check valve manual bypass valve was discovered to be open. The open one-eighth inch bypass valve effectively rendered the excess flow check valve inoperable. Additional inspection performed as a result of this finding identified two additional open excess flow check valve bypass valves. The additional affected valves were XV-43-103B, which is in the Recirculation Pump Seal Purge instrument piping, and XV-42-1F065B which is in the Reactor Pressure Vessel instrument piping. It was determined that these three excess flow check valves were inoperable upon plant entry into the startup mode on April 1, 1985. Technical Specification 3.0.4 requires that applicable Limiting Condition of Operation action statements be met upon entry into startup, power operation, or hot shutdown modes. Action statement 3.6.3.b requires reactor instrument line excess flow check valves to be operable in the startup, power operation, and hot shutdown modes. The requirements of Technical Specifications 3.0.4 and 3.6.3.b were not met in that the startup mode was entered and the three excess flow check valves were bypassed.

Consequences of the Event:

The excess flow check valves act to isolate the instrument piping in the event of a break in the instrument piping outside primary containment. The open bypass valves precluded the ability of the three check valves to isolate the affected instrument lines. If an instrument line break had occurred outside primary containment during power operation with the one-eighth inch bypass valves open, a leakage path for primary system coolant into secondary containment would have been established. There were no adverse effects as a result of this event.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES 8/31/85

| | | | | | | | |
|------------------------------------------------------------|------------------------------------------------|----------------|----------------------|--------------------|----------|--|--|
| FACILITY NAME (1) Limerick Generating Station Unit 1 | DOCKET NUMBER (2) 0500035285-047-0003 OF 04 | LER NUMBER (6) | | | PAGE (3) | | |
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | | |
| | | | | | | | |

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

Cause of the Event:

The manual bypass valves to XV-51-103D (LPCI instrument line) and XV-42-1F065B (Reactor Pressure Vessel instrument line) were inadvertently left open by Instrument and Controls technicians performing the "Instrument Line Backfilling Procedure," ST-2-36-631-1, on March 28, 1985. Backfilling of reactor instrument piping with demineralized water is performed to purge air from the instrument line prior to a unit startup. The XV-43-103B manual bypass valve (Recirc Pump Seal Purge instrument line) was open due to a checkoff list deficiency, in that the valve was inadvertently excluded from the C.O.L., used to verify the proper position of the manual bypass valves in the reactor instrument piping. Therefore, the XV-43-103B bypass valve was not routinely checked along with the other bypass valves.

Corrective Actions:

As a result of the discovery of the open XV-51-103D bypass valve (LPCI instrumentation piping), Instrument and Controls Technicians inspected the remaining reactor instrument line excess flow check valves required operable by the Technical Specifications. This resulted in the finding of open bypass valves to check valves XV-43-103B (Recirc Pump Seal Purge instrument line) and XV-42-1F065B (RPV instrument line). The three bypass valves were closed upon discovery, returning the excess flow check valves to service.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

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

| | | | | | | | |
|------------------------------------------------------------|------------------------------------------|----------------|----------------------|--------------------|----------|---|--------|
| FACILITY NAME (1) Limerick Generating Station Unit 1 | DOCKET NUMBER (2) 0 5 0 0 0 3 5 2 8 5 | LER NUMBER (8) | | | PAGE (3) | | |
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | | |
| | | 8 5 | 0 4 7 | 0 | 0 0 | 4 | OF 0 4 |

TEXT (If more space is required, use additional NRC Form 368A) (17)

Action Taken to Prevent Recurrence:

Measures have been implemented regarding the imposition of strict controls over the opening of the bypass valves to the excess flow check valves listed in Table 3.6.3-1 of the Technical Specifications. These controls involve the placing of locks on the handles of the bypass valves, securing them closed. A key is now required to open the bypass valve to any primary containment excess flow check valve listed in Table 3.6.3-1. As of May 17, 1985, all bypass valves listed in Table 3.6.3-1 have been locked closed. Instrument and Control and Laboratory and Testing personnel have been informed of the recommended method of verifying the position of bypass valves. To minimize the repositioning of instrument line bypass valves, "Instrument Line Backfilling Procedure, ST-2-36-631-1, is in the process of being revised to eliminate the opening of bypass valves during backfilling.

Previous Similar Occurrences

The following LER's report events similar by cause: LER's 85-037, 85-039, and 85-040.

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4000

May 21, 1985

Docket No. 50-352

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

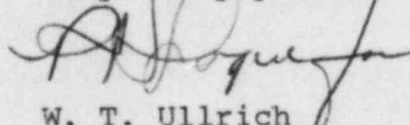
SUBJECT: Licensee Event Report
Limerick Generating Station - Unit 1

This LER deals with the failure to meet Technical Specifications 3.0.4 and 3.6.3.b in that Unit 1 entered into the startup mode with three reactor instrument piping excess flow check valves inoperable.

| | |
|------------------|---------------------------------------------------------------|
| Reference: | Docket No. 50-352 |
| Report Number: | 85-047 |
| Revision Number: | 00 |
| Event Date: | April 20, 1985 |
| Report Date: | May 21, 1985 |
| Facility: | Limerick Generating Station P.O. Box A, Sanatoga, PA 19464 |

This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i).

Very truly yours,



W. T. Ullrich
Superintendent
Nuclear Generation Division

cc: Dr. Thomas E. Murley, Administrator, Region I, USNRC
J. T. Wiggins, Senior Site Inspector
See Service List

IE22

1/1

cc: Judge Helen F. Hoyt
Judge Jerry Harbour
Judge Richard F. Cole
Troy B. Conner, Jr., Esq.
Ann P. Hodgdon, Esq.
Mr. Frank R. Romano
Mr. Robert L. Anthony
Ms. Phyllis Zitner
Charles W. Elliott, Esq.
Zori G. Ferkin, Esq.
Mr. Thomas Gerusky
Director, Penna. Emergency Management Agency
Angus Love, Esq.
David Wersan, Esq.
Robert J. Sugarman, Esq.
Martha W. Bush, Esq.
Spence W. Perry, Esq.
Jay M. Gutierrez, Esq.
Atomic Safety & Licensing Appeal Board
Atomic Safety & Licensing Board Panel
Docket & Service Section (3 Copies)
James Wiggins
Timothy R. S. Campbell

January 16, 1985