



231 W. Michigan, P.O. Box 2046, Milwaukee, WI 53201-2046

(414) 221-2345

VPNPD-96-0087

October 14, 1996

Document Control Desk
U.S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, D. C. 20555

Gentlemen:

DOCKET 50-266
LICENSEE EVENT REPORT 96-009-00
COMPONENT COOLING WATER SYSTEM OUTSIDE DESIGN
BASIS FOR CLOSED SYSTEM OUTSIDE CONTAINMENT
POINT BEACH NUCLEAR PLANT, UNIT 1

Enclosed is Licensee Event Report 96-009-00 for Point Beach Nuclear Plant, Unit 1. This report is provided in accordance with 10 CFR 50.73(a)(2)(ii)(B), "a condition that was outside the design basis of the plant." This report describes the situation of the component cooling water system not in conformance with the applicable design basis requirements for a closed system outside containment.

Commitments documented in this licensee event report are included in the corrective action section, in italics. If you require additional information, please contact us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bob Link', written over a large, stylized 'X' or 'A' mark.

Bob Link
Vice President
Nuclear Power

CAC/kmc

Enclosure

cc: NRC Resident Inspector
NRC Regional Administrator

220022

9610230231 961014
PDR ADOCK 05000266
S PDR

11/11
Lev

LICENSEE EVENT REPORT (LER)

(See reverse for required number of
digits/characters for each block)ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH
THIS INFORMATION COLLECTION REQUEST: 50.0 HRS.
REPORTED LESSONS LEARNED ARE INCORPORATED INTO
THE LICENSING PROCESS AND FED BACK TO INDUSTRY.
FORWARD COMMENTS REGARDING BURDEN ESTIMATE
TO THE INFORMATION AND RECORDS MANAGEMENT
BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY
COMMISSION, WASHINGTON, DC 20555-0001, AND TO
THE PAPERWORK REDUCTION PROJECT

FACILITY NAME (1)

Point Beach Nuclear Plant, Unit 1

DOCKET NUMBER (2)

05000266

PAGE (3)

1 OF 4

TITLE (4)

COMPONENT COOLING WATER SYSTEM OUTSIDE DESIGN BASIS FOR CLOSED SYSTEM OUTSIDE CONTAINMENT

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 NAME	DOCKET NUMBER
09	12	96	96	-- 009	-- 00	10	14	96	FACILITY NAME	DOCKET NUMBER
										05000
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
			20.2201(b)			20.2203(a)(2)(v)			50.73(a)(2)(i)	50.73(a)(2)(viii)
POWER LEVEL (10)		100	20.2203(a)(1)			20.2203(a)(3)(i)		X	50.73(a)(2)(ii)	50.73(a)(2)(x)
			20.2203(a)(2)(i)			20.2203(a)(3)(iii)			50.73(a)(2)(iii)	73.71
			20.2203(a)(2)(ii)			20.2203(a)(4)			50.73(a)(2)(iv)	OTHER
			20.2203(a)(2)(iii)			50.36(c)(1)			50.73(a)(2)(v)	Specify in Abstract below
			20.2203(a)(2)(iv)			50.36(c)(2)			50.73(a)(2)(vii)	or in NRC Form 366A

LICENSEE CONTACT FOR THIS LER (12)

NAME

Curtis A. Castell, Licensing Engineer

TELEPHONE NUMBER (Include Area Code)

(414) 221-2019

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)

YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

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

On September 12, 1996, during a Quality Assurance audit of the 10 CFR 50 Appendix J program, it was discovered that part of the Unit 1 component cooling water (CCW) system does not conform with the currently applicable design basis for a closed system outside containment at Point Beach Nuclear Plant. The component cooling water system provides cooling and makeup to the two waste gas compressors, K-1A and K-1B (see PBNP FSAR figure 9.3-2). The isolation valves for the makeup lines, WG-1030A and WG-1032A, are not automatic isolation valves. If one or both of these valves were in the open position, leakage from the containment through the CCW system during a LOCA could leave the CCW system and enter the waste gas system. After discovery of this condition, manual isolation valves (CC-732A, 732C, 732D and 732F) were closed to isolate this portion of the system. Administrative controls have been implemented such that if these isolation valves are opened, an operator is assigned to rapidly isolate this part of the system if necessary.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Point Beach Nuclear Plant, Unit 1	05000266	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
		96	- 009	- 00	

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

Event Description:

On September 12, 1996, during a Quality Assurance audit of the 10 CFR 50 Appendix J program, it was discovered that part of the Unit 1 component cooling water (CCW) system does not conform with the currently applicable design basis for a closed system outside containment at Point Beach Nuclear Plant. The design basis criteria being used at Point Beach for closed systems outside containment includes the requirement that the system not communicate with the outside atmosphere. Contrary to this requirement, it was discovered that the CCW system could communicate with another system which is not evaluated as an extension of the CCW system boundary.

The component cooling water system provides cooling and makeup to the two waste gas compressors, K-1A and K-1B (see PBNP FSAR figure 9.3-2). The isolation valves for the makeup lines, WG-1030A and WG-1032A, are not automatic isolation valves. If one or both of these valves were in the open position, leakage from the containment through the CCW system during a LOCA could leave the CCW system and enter the waste gas system.

These valves, WG-1030A and WG-1032A, are fail-close air operated valves which receive an automatic open signal based on low level in the associated waste gas compressor moisture separator (Z-58A or Z-58B). Also, as stated previously, these valves do not receive an automatic isolation signal.

After discovery of this condition, manual isolation valves (CC-732A, 732C, 732D and 732F) were closed to isolate this portion of the system. Administrative controls have been implemented such that if these isolation valves are opened, an operator is assigned to isolate this part of the system rapidly if necessary. These administrative controls are consistent with Technical Specification requirements for containment penetrations.

Unit 1 continued to operate at 100% power during this event.

Component and System Description:

The CCW system is described in §9.3 of the PBNP FSAR. The identification of the CCW system as a closed system outside containment is provided in §5.2 of the PBNP FSAR.

The IEEE Standard 803A-1983 component identifiers for this report are:

Valve, Isolation ISV

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Point Beach Nuclear Plant, Unit 1	05000266	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 4
		96	- 009	- 00	

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

Cause:

The similar occurrences provided below describe two other situations of the CCW system failing to meet the closed system design basis requirement. Both of these situations were attributed to inadequate design/design review of the CCW system.

Corrective Action:

The immediate corrective action for this event included isolation of the affected portion of the CCW system. The isolation valves are safety-tagged closed. Instructions for clearing tags direct assignment of an operator to isolate this part of the system rapidly if necessary.

An evaluation will be completed and appropriate means of maintaining the CCW system as a closed system outside containment for the situation of isolation valves WG-1030A and WG-1032A will be implemented.

A complete review of the CCW system will be performed to verify that the system meets the Point Beach design basis requirements for a closed system outside containment. If other conditions are identified that are outside the design basis for the system they will be further evaluated and reported under 10 CFR 50.73 and appropriate corrective actions taken.

Reportability:

This Licensee Event Report is being submitted in accordance with the requirements of 10 CFR 50.73(a)(2)(ii)(B), "a condition that was outside the design basis of the plant."

Safety Assessment:

At the time of discovery of this situation, the isolation valves, WG-1030A and WG-1032A, were in the closed position. These valves are usually closed. As stated previously, these valves receive automatic open signals based on low level in the associated waste gas compressor moisture separator (Z-58A or Z-58B). These compressors operate infrequently and seal makeup is in-service even less frequently. Therefore, it is unlikely that either of these valves would have been in the open position coincidentally with a LOCA and failure of the primary isolation valves for the CCW system. Also, leakage from the CCW system to the waste gas system is capable of being contained in the waste gas system. The waste gas system is leak tested annually via procedure IT-600.

The affected portion of the CCW system is being maintained isolated by manual isolation valves. Administrative controls have been implemented such that if these isolation valves are opened, an operator is assigned to isolate this part of the system rapidly if necessary.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Point Beach Nuclear Plant, Unit 1	05000266	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	4 OF 4
		96	- 009	- 00	

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

Therefore, the health and safety of the public and plant personnel was not adversely affected by this situation.

Similar Occurrences:

A summary of previously reported events was reviewed to determine if any of these events involved the component cooling water system being outside the design basis for a closed system outside containment. The following similar events were previously reported:

Unit 2 LER 92-002-00 Radioactive waste disposal system component cooling water isolation valves outside design basis

Common LER 92-009-00 Component cooling water system surge tank vent valves outside design basis