

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMC NO. 3150-0104

EXPIRES 8/31/86

FACILITY NAME (1) Peach Bottom Atomic Power Station - Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 2 7 7	LER NUMBER (5)			PAGE (3)		
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TEXT (if more space is required, use additional NRC Form 365a) (17)

Description of the Event:

The motor driven fire pump and other pumps are located on the Unit 3 side of the pump structure. Accumulated silt is removed annually from the common suction area of these pumps. This silt removal process requires one or more divers to be in the water in the pump suction area. Therefore, to ensure the safety of the divers, these pumps are blocked out of service while silt removal is in progress. The silt removal process usually takes about 10 days to complete, working one shift per day.

There are two fire pumps: a motor driven fire pump, and a diesel engine driven fire pump. The diesel engine driven pump is not affected when silt is being removed from the Unit 3 side of the pump structure because it is located on the Unit 2 side of the pump structure.

On September 17, 1985 with no fuel in the Unit 3 reactor, the motor driven fire pump and other pumps were removed from service by the issuance of a single safety permit to allow a diver to inspect the pump suction area for accumulated silt. After the inspection, the permit was returned; but the pump was not returned to service. However, it was quickly restorable to service in the event of a fire. Although the Control Operator was informed that the silt removal would not begin until September 24, 1985, the pumps were not returned to service in the meantime. On September 23, the motor driven fire pump was returned to service temporarily and a surveillance test was performed to prove it operable at 1950 hours.

Later, on September 23 at 2130 hours, the motor driven fire pump was again removed from service by reapplying the permit to allow silt removal. Silt removal began on September 24, 1985. On September 25, no silt removal was performed because the divers were needed to inspect the Unit 2 "A" RHR pump suction strainer located in the Unit 2 torus. On September 26, silt removal began again, but was terminated at 1200 hours so the divers could return to the Unit 2 torus to remove the "A" RHR pump suction strainer and install a blank flange. On September 27, no work was performed because of a hurricane alert. On September 30, no silt removal occurred because the truck, into which the silt was being pumped, was needed to aid in the cleanup of an oil spill on the Delaware River.

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From October 1 to October 10, silt removal took place 10 hours per day without interruption, except for the weekend, until completed. On October 11, at 2030, blocking for the motor driven fire pump was removed and at 2200 hours, the pump was declared operable after the performance of a surveillance test.

Technical Specification 4.14.A.2 requires that with one fire pump inoperable the remaining fire pump be proven operable immediately and at least every 72 hours thereafter until the inoperable pump is restored to operable status. The diesel engine driven fire pump was proven operable in accordance with this Specification while the motor driven fire pump was inoperable.

Technical Specification 3.14.A.2 requires that if one of the two fire pumps is inoperable, it must be made operable within seven days or a special report must be submitted to the Commission within 31 days. Because the silt removal process normally takes more than seven days, the standard practice has been to return the pump to service prior to exceeding the seven-day allowable outage time, followed by an operability test of the pump, and subsequent (within hours) removal of the pump from service to resume silt removal. This was done with the recognition that the blocked fire pump could be quickly restored to service in the event of an emergency.

In accordance with the practice and the Technical Specification, the motor driven fire pump should have been returned to service and tested for operability on September 30 before 2130 hours, but it was not because of an error by operations personnel. The special report was not submitted within 31 days because more time was required to complete the investigation necessary to provide a complete report.

Unit 2 was operating at 100% power from September 17 until it was shutdown on September 20, 1985. Unit 2 was shutdown from September 20, 1985 to October 4, 1985. Unit 2 returned to power operation on October 4, 1985 and operated continuously through October 11, 1985 when the motor driven fire was returned to service. Unit 3 was shutdown for a refueling and maintenance outage with all fuel removed from the reactor for most of the outage.

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TEXT (If more space is required, use additional NRC Form 366A (1))

The EIIS code for the affected system is KP, fire protection, and P, pump, for the affected component.

Consequences of the Event:

The backup diesel engine driven fire pump was proven operable in accordance with the Technical Specification while the motor driven pump was out-of-service. The motor driven fire pump could have been returned to service within approximately 30 minutes if necessary. Each pump is capable of supplying water at the required pressure for the largest sprinkler flow in the plant, plus 1000 gpm for other fire extinguishing devices. Therefore, it is unlikely that this condition would have caused adverse safety consequences.

Cause of the Event:

The cause for not conforming to the practice of proving the pump operable within the seven day limit of the Technical Specification on September 30 was an error by the licensed operator. The mechanism for tracking equipment that is out of service and the deadline for its return to service is the Shift Turnover Checklist. The Checklists of September 30, 1985 did not indicate that the pump was required to be returned to service that day.

The Unit 2 Reactor Operator, the Chief Operator, and the Shift Supervisor should have used their turnover checklists to identify that the motor driven fire pump was out-of-service. This was not consistently done, and the portion of the Unit 2 Reactor Operator and Chief Operator Checklists for Technical Specification equipment inoperability and deadline for return to service was not used. Because the deadline for return to service was not listed there was no effective method to assure the timely return to service of the equipment.

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On October 3, 1985 we discovered that the motor driven fire pump had not been returned to service as required by the Limiting Condition for Operation. A licensed operator determined that the requirement was to write a special report and he took action to begin this process.

A special report was not submitted within the required time limit of 31 days because more time was required to gather additional information and formulate additional corrective actions.

Corrective Actions:

In the future when silt removal is performed, steps will be taken to reduce the amount of time the affected fire pump is out of service.

The Shift Turnover Checklists (Administrative Procedure, A-7, Appendix 5) have been revised to provide a place for the entry of the date and time that components must be returned to service, and the operating personnel have been reminded that the checklist must be used to track Technical Specification equipment that is out of service. This should prevent recurrence of missing such a Technical Specification deadline.

The operator was instructed that the pump should have been checked for operability at the time when it was discovered that the seven-day limiting condition of operation had been exceeded. The fact that the action required generation of a special report did not mean that the equipment should not have been tested for operability when the problem was identified.

Previous Similar Occurrences:

None.

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January 13, 1986

Docket Nos. 50-277
50-278

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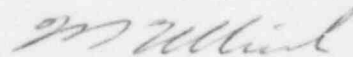
SUBJECT: Licensee Event Report
Peach Bottom Atomic Power Station - Units 2 & 3

This LER has been revised to correct the Facility Name, Docket Number, and Other Facilities Involved fields. LERs common to Units 2 and 3 are normally submitted under the Docket Number for Unit 2.

Reference:	Docket Nos. 50-277 & 50-278
Report Number:	2-85-21
Revision Number:	01
Event Date:	September 30, 1985
Report Date:	January 13, 1986
Facility:	Peach Bottom Atomic Power Station RD 1, Box 208, Delta, PA 17314

This LER is being submitted in accordance with the requirements of 10 CFR 50.73(a)(2)(i)(B). We apologize for any inconvenience this error may have caused.

Very truly yours,



W. T. Ullrich
Superintendent
Nuclear Generation Division

cc: Dr. Thomas E. Murley, Administrator, Region I, USNRC
T. P. Johnson, NRC Resident Inspector

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