

## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)										DOCKET NUMBER (1)										PAGE 13	
Limerick Generating Station - Unit 1										0181010101512										1 OF 014	
TITLE (4)										OTHER FACILITIES INVOLVED IN											
Missed Snubber Surveillance Requirement Due to a Personnel Error which Resulted in a Procedure Deficiency																					
EVENT DATE (8)				LER NUMBER (8)				REPORT DATE (7)				FACILITY NAME				DOCKET NUMBER (8)					
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR					0181010101512								
0	8	2	4	8	7	8	7	0	4	3	0	1	0	1	2	5	8				
THE REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (1)																					
OPERATING MODE (8)				20.402 (1)				20.408 (1)				20.73a (1) (11)				72.71a					
POWER LEVEL (16)				20.408 u (1) (11)				20.73a u (1) (11)				20.73a (1) (11)				72.71a					
0				0				0				0				OTHER (Summary of Accident Report and in Table NRC Form 200A)					
				20.408 u (1) (11)				20.73a (1) (11)				20.73a (1) (11) (1A)									
				20.408 u (1) (11)				20.73a (1) (11)				20.73a (1) (11) (1B)									
				20.408 u (1) (11)				20.73a (1) (11)				20.73a (1) (11)									
LICENSEE CONTACT FOR THIS LER (12)										TELEPHONE NUMBER											
NAME										AREA CODE											
Charles A. Mengers, Senior Engineer, Licensing Section										215 81411-151814											
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THE REPORT (12)																					
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC												
SUPPLEMENTAL REPORT EXPECTED (14)										EXPECTED SUBMISSION DATE (16)											
YES (1) OR COMPLETE EXPECTED SUBMISSION DATE:										X NO											

ABSTRACT (Limit to 1000 characters, i.e., address only; filler space only; no more than 116)

## Abstract: 87-043

On August 24, 1987 at 1500 hours it was determined that a snubber on the High Pressure Coolant Injection System was not visually inspected within ten months of commencing power operation as required by Technical Specification Surveillance Requirement 4.7.4. During a visual inspection of all snubbers in the May 1986 Surveillance Test Outage snubber EBD-106-E6-H31 (snubber H31) was not inspected. Snubber EBD-105-E6-H12 (snubber H12) was visually inspected twice, once mistakenly for snubber H31. The cause of this oversight was a personnel error which resulted in a procedural deficiency in that the serial number listed in the surveillance test for snubber H31 was incorrectly listed as the serial number for snubber H12. This number was incorrectly assigned to snubber H31 prior to completion of the Startup Test Program at Limerick Generating Station. Snubber H31 was visually inspected and functionally tested during July of the 1987 Refuel Outage and was determined to be operable. Surveillance Test ST-4-103-098-1 which provides for visual inspection of snubber H31 has been revised to include the correct serial number for this snubber. There were no adverse consequences as a result of this event. There was no release of radioactive material as a result of this event. The snubber visual inspections and functional tests for the 1987 Refuel Outage have been completed and no additional discrepancies have been found. The incorrect snubber

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# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	PRECEDENCE NUMBER		
Zimmerick Generating Station						
Unit 1	01010101352817	01413	011	012	OF	014

TEXT OF REPORT SHOULD BE PREPARED WITH REFERENCE TO NRC FORM 2004, 2/1/77

## Unit Conditions Prior to the Event:

Operating Mode: Cold Shutdown

Reactor Power: 0%

## Description of the Event:

On August 24, 1987 at 1500 hours it was determined that a snubber on the High Pressure Coolant Injection (HPCI) system was not visually inspected within ten months of commencing power operation as required by a Technical Specification surveillance requirement.

While reviewing snubber test information compiled during the 1987 Refuel Outage Snubber Inspection, it was discovered that snubber EBD-106-E6-H31 (snubber serial #13975) (snubber H31) located on the HPCI steam supply drain line was not visually inspected during the May 1986 Surveillance Test Outage. All snubbers were required to be inspected during this outage to satisfy Technical Specification Surveillance Requirement 4.7.4 which states "The first inservice visual inspection of each type of snubber shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers."

Further investigation determined that snubber EBD-105-E6-H12 (snubber serial #20462) (snubber H12) located on the Reactor Core Isolation Cooling (RCIC) system steam supply drain line was inspected twice during the 1986 Surveillance Test Outage, one of the inspections being intended for snubber H31.

The EIIS code for the systems and components involved are:  
Reactor Core Isolation Cooling System - BN

High Pressure Coolant Injection System - BT

Snubbers - SNB

## Consequences of the Event:

There were no adverse consequences as a result of this event. There was no release of radioactive material to the environment as a result of this event. Snubber EBD-106-E6-H31 was visually

# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION  
APPROVED DATE: 12-10-86  
EXPIRED DATE: N/A

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

TEXT OF EVENT REPORT (1) (CONTINUED FROM PREVIOUS PAGE) (NRC FORM 2004 12/1/83)

inspected and functionally tested with satisfactory results during the 1987 Refuel Outage.

An analysis into the consequences of a seismic event had the snubber been defective has been performed and the results are as follows:

1. Had the snubber been inoperable piping stresses and pipe support adequacy would have remained within the code allowables.
2. Had the snubber been "locked" it would have failed to the inoperable condition which would result in a piping configuration as analyzed in 1) above.

In conclusion, the piping system in question would have met all code allowables even if snubber SP-EBD-106-E6-H31 had been found inoperable.

## Cause of the Event:

### Cause Code:

A, Personnel Error  
D1, Procedure Deficiency

The cause of this event was a personnel error which resulted in a procedural deficiency. Surveillance Test ST-4-103-098-1 "Accessible Snubber Visual Inspection - HPCI #9" provides visual inspection for snubber H31 (snubber serial #13975). However, the ST had the serial number for snubber H31 incorrectly listed as #20462. During the performance of this ST in May 1986, the individual performing the test observed snubber H12 (serial #20462) of the RCIC system, which is located in the same area as snubber H31 of the HPCI system at the same elevation. Upon seeing the serial #20462 (which is the serial number listed in the ST), the individual concluded that it was the correct snubber and proceeded to perform the visual inspection and signed off the ST as complete. Deficiency Report No. 86-161 was written reporting that the snubber was tagged with the incorrect hanger number.

Further investigation into the cause of this event revealed that the incorrect serial number in ST-4-103-098-1 was the result of a cognitive personnel error made prior to completion of the Startup Test Program. Vendor field engineers were given the task of

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMS NO. 21K-015K  
EXPIRES 8/21/81

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TEXT IF MORE SPACE IS REQUIRED USE ADDITIONAL NRC FORM 200a (11/77)

recording the snubber serial numbers and matching them to a hanger number. This was done by physically inspecting the snubber (located by hanger numbers) and recording the serial number etched on the snubber. The snubber identification error occurred at this time. A list of hanger numbers vs. snubber serial numbers was then generated from this information. This list was provided to PECO and the snubber identification error was carried forward when creating the snubber surveillance test.

Corrective Actions:

Snubber EBD-106-E6-H31 was visually inspected and functionally tested during the 1987 Refuel Outage. The results of the functional test demonstrate that the snubber is operable.

Surveillance test ST-4-103-098-1 has been revised to include the correct serial number for snubber EBD-106-E6-H31.

Actions Taken to Prevent Recurrence:

Snubber visual inspections and functional tests have been completed for the 1987 Refuel Outage and no similar discrepancies were discovered. The incorrect serial number on the ST for snubber EBD-106-E6-H31 has been viewed as an isolated event.

Previous Similar Occurrences:

None

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January 25, 1988  
Docket No. 50-352

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

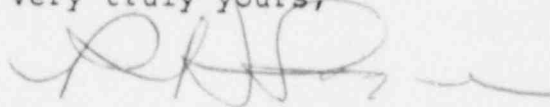
SUBJECT: Licensee Event Report  
Limerick Generating Station - Unit 1

This revised LER reports operation of the plant in a condition prohibited by Technical Specifications due to a missed snubber Surveillance Requirement caused by a personnel error which resulted in a procedure deficiency.

Reference:	Docket No. 50-352
Report Number:	87-043
Revision Number:	01
Event Date:	August 24, 1987
Report Date:	January 25, 1988
Facility:	Limerick Generating Station P.O. Box A, Sanatoga, PA 19464

This revised LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(b). This LER presents further information regarding the consequences of an inoperable snubber. Changes are shown by a vertical line in the margin of the affected page.

Very truly yours,



R. H. Logue  
Assistant to the Manager  
Nuclear Support Department

cc: W. T. Russell, Administrator, Region I, USNRC  
E. M. Kelly, Senior Resident Site Inspector

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