

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Davis-Besse Unit 1										DOCKET NUMBER (2) 0 5 0 0 0 3 4 6										PAGE (3) 1 OF 0 3	
TITLE (4) Service Water Valve Incorrectly Declared Inoperable During Mode Change																					
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	1	0	8	8	7	8	7	0	0	3	0	5	0	0	0						
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more of the following) (11)																					
OPERATING MODE (9)		1		20.402(b)		20.408(a)		50.73(a)(2)(iv)		73.71(b)											
POWER LEVEL (10)		0 5 1 0		20.408(a)(1)(i)		50.38(a)(1)		50.73(a)(2)(v)		73.71(a)											
				20.408(a)(1)(ii)		50.38(a)(2)		50.73(a)(2)(vi)		Y OTHER (Specify in Abstract below and in Text, NRC Form 308A)											
				20.408(a)(1)(iii)		50.73(a)(2)(i)		50.73(a)(2)(vii)(A)		Special Report											
				20.408(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(vii)(B)													
				20.408(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(viii)													
LICENSEE CONTACT FOR THIS LER (12)																					
NAME Jan C. Stotz, Associate Nuclear Engineer, Technical Support Dept.										TELEPHONE NUMBER 4 1 1 9 2 1 4 9 1 - 5 1 0 1 0 1 0											
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							
YES (If yes, complete EXPECTED SUBMISSION DATE)										X NO											

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

On January 8, 1987 it was discovered that seven mode changes had occurred with a Containment Air Cooler Service Water Outlet Valve (SW1357) declared inoperable. Maintenance had been performed on the non-safety related portion of the valve actuator only. Although this valve had been listed as inoperable, it had never actually been rendered inoperable as a Containment Isolation Valve and was at all times capable of performing its safety function. Although no violation of Technical Specifications resulted, procedural violations occurred which could have led to a violation of Technical Specifications. Once discovered the Maintenance Work Order for the service water valve was completed and signed off with an entry in the Unit Log that SW 1357 was operable.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

FACILITY NAME (1): Davis-Besse Unit 1	DOCKET NUMBER (2): 0 5 0 0 0 3 4 6 8 7 -	LER NUMBER (6):			PAGE (3):		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		0 0 3 -	0 1	0 2	OF	0 3	

TEXT (If more space is required, use additional NRC Form 388A-2) (17)

Description of Occurrence:

On December 10, 1987 a Maintenance Work Order (MWO) for the repair of Containment Air Cooler (CAC) 1-2 Service Water Outlet Valve, SW 1357, was signed by the Shift Supervisor. An enclosure for the MWO designated that the work would make the valve inoperable for maintenance on the temperature controller on the valve. The Shift Supervisor logged SW 1357 as inoperable and designated Technical Specification (TS) 3.6.3.1 and TS 3.6.2.2 as the applicable Technical Specification. Additionally the condition was placed on the Equipment Out of Service Status Board, and SW 81, a downstream manual isolation valve, was closed. The Technicians evaluated the temperature controller and determined that parts should be ordered prior to correcting the maintenance concern. All maintenance activity ceased on December 11, 1986 until parts were obtained and work commenced on January 8, 1987.

The Unit was in Mode 5 at the time and was being prepared for heatup and startup following an extended outage. Several extensive searches had been conducted of the open MWO files to assure there were no MWO's which would prevent mode changes. This MWO was generated after these checks and not logged against a mode change checklist. The Prestartup Checklist was signed off for the first mode change and subsequent mode changes although the service water valve, SW 1357, remained on the out of service status board.

Designation of Apparent Cause of Occurrence:

Even though SW 1357 was never inoperable in that the safety features actuation portion of the valve actuator had not malfunctioned nor had ever been disabled during this period, the valve had been declared inoperable by the Shift Supervisor. No violation of Technical Specifications resulted but there were several procedural violations and inadequacies which could have led to a Technical Specification violation. The Prestartup Checklist requires that the status board be checked and any Technical Specification Action Statements be verified as not preventing the mode change. This was not performed to the extent required because operations personnel believed the Action Statements were being met. Two of three Containment Air Coolers were always operable as required by TS 3.6.2.2 "Containment Cooling System" and SW 81 isolated the containment penetration as required by TS 3.6.3.1 Action c; however, Table 3.6-2 which itemized containment penetrations does not provide allowance for mode change with the penetration inoperable. There was, therefore, an inconsistency in the Technical Specifications as well as a basic misunderstanding of the Table 3.6-2.

AD 1844.02, Control of Work (MWO), Step 6.10.4 also states that work which has begun (i.e. Shift Supervisor has granted approved) but cannot be completed promptly may be suspended by completing an MWO Suspension Form. Work on equipment required by Technical Specification may not be suspended without the approval of the Shift Supervisor. Suspension of maintenance work should be used to return equipment to service prior to completion of all the work listed on a MWO. Work should not be suspended if the delay

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		YEAR	SEQUENTIA NUMBER	REVISION NUMBER			

TEXT (If more space is required, use additional NRC Form 365A's) (17)

will be less than one week and the equipment is not needed immediately for plant operations.

Analysis of Occurrence:

SW 1357 serves three functions; it modulates flow based on temperature (non-safety function), serves as a containment isolation valve per General Design Criteria 56, and performs a fail-open function with a fan start due to a safety feature actuation. Only the non-safety portion of the valve actuator had had a maintenance concern during this period and therefore, SW 1357 was always capable of serving its safety function. Sufficient containment cooling was supplied by the two operable CAC's. Not only was SW 1357 always able to provide its containment isolation but the downstream isolation provided additional containment isolation protection. There was no reduction in the margin of safety.

Corrective Action:

SW 1357 temperature control feature was repaired and returned to service January 10, 1987.

Both operations and shop personnel did not fully understand the requirements of TS 3.6.3.1 Table 3.6-2; therefore, selected staff, engineering, and SRO licensed individuals will be provided Technical Specification training to reemphasize the requirements.

Inconsistencies in the Technical Specifications are being identified in a second phase of TS verification. As these inconsistencies are identified, Toledo Edison will take actions deemed necessary to resolve the findings. Any necessary training of personnel will also be performed. The second phase of the Technical Specification Verification Program commenced in 1987 and is expected to be completed in 1989.

The Maintenance Work Order process is currently under review with anticipated changes to better human factor the process and streamline the manner in which MWO's are statused prior to mode changes. Equipment operability enclosure will be modified to better identify how the task specifically affects the component for operability or functionality by April 1, 1987. All personnel involved are being formally counselled in this area to prevent recurrence.

Failure Data:

No other reports of this nature in the Containment Air Cooler system have been made. This is the only report of a containment isolation valve being incorrectly declared inoperable during mode changes.

REPORT NO: NP-33-87-02

PCAQ NO(s): 87-008

January 26, 1988



EDISON PLAZA
300 MADISON AVENUE
TOLEDO, OH 43652-0001

Log No. KA88-0007

NP-33-87-02 Rev. 1

Docket No. 50-346

License No. NPF-3

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

Gentlemen:

Enclosed is Revision 1 to Licensee Report 87-003. The revisions to the report are indicated by a "1" in the left margin of each page.

Please destroy or mark superseded your previous copy of this report and replace with the attached revision.

Yours truly,

Louis F. Storz
Plant Manager
Davis-Besse Nuclear Power Station

LFS/ed

Enclosure

cc: Mr. A. Bert Davis
Regional Administrator,
USNRC Region III

Mr. Paul Byron
DB 1 NRC Resident Inspector

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