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Nuclear Business Unit

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LER 272/97-001-01
SALEM GENERATING STATION - UNIT 1
FACILITY OPERATING LICENSE NO. DPR-70
DOCKET NO. 50-311

Gentlemen:

This Licensee Event Report entitled "FAILURE TO PERFORM TECHNICAL SPECIFICATION SURVEILLANCE OF COMPONENT COOLING WATER SYSTEM CHECK VALVES" is being submitted pursuant to the requirements of the Code of Federal Regulations ****10CFR50.73(a)(2)(I)(B) ****

Sincerely,

A. C. Bakken III
General Manager
Salem Operations

Attachment

/rbk

C Distribution
LER File 3.7

NRC FORM 366 (6-1998) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 06/30/2001

Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
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TITLE (4)
FAILURE TO PERFORM TECHNICAL SPECIFICATION SURVEILLANCE OF COMPONENT COOLING WATER SYSTEM CHECK VALVES

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
02	15	97	97	001	01	12	24	98	Salem Unit 2	05000311
									FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)			
POWER LEVEL (10)	000	20.2201(b)	20.2203(a)(2)(v)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)
		20.2203(a)(1)	20.2203(a)(3)(i)	50.73(a)(2)(ii)	50.73(a)(2)(x)
		20.2203(a)(2)(i)	20.2203(a)(3)(ii)	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 or in NRC Form 366A
		20.2203(a)(2)(iv)	50.36(c)(2)	50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Robert B. Knieriem, Licensing Engineer	609-339-1782

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

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 15 single-spaced typewritten lines) (16)

This supplemental LER reports a TS non-compliance identified during a review of the Salem In-service Test program (IST). On February 15, 1997 a review of the Salem IST program determined that the IST surveillance of Component Cooling Water system check valves CC195 and CC210 was not performed as required. CC195 and CC210, which serve as a part of the ASME Class 3 boundary, were exempted from IST program testing in 1991 under the provision that they remain isolated by closure of manual valves CC145 and CC146. Contrary to the requirements of the IST program, changes were made to the required positions of CC145 and CC146 that permitted at least one of these two manual isolation valves to remain open during plant operation. Because these changes were made without consideration of IST program requirements, reverse flow testing of CC195 and CC210 to verify the integrity of the ASME Class 3 boundary was not performed.

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B), any condition prohibited by the plant's Technical Specifications. Specifically, the requirements of TS 4.0.5 regarding in-service inspection and testing of ASME Code Class 1, 2, and 3 components.

The cause of this event was a lack of programmatic interface between the IST program personnel and Operations department personnel responsible for programs used to control system configuration. To prevent recurrence, procedural controls will be implemented to inform IST program personnel of changes to normal valve positions before those changes are implemented so that adjustments to the IST program can be made when warranted to comply with TS 4.0.5.

PLANT AND SYSTEM IDENTIFICATION

Westinghouse - Pressurized Water Reactor

Safety Injection {BP/-} *
Containment Spray {BE/-}
Component Cooling {KB/-}
Main Steam {SB/-}

* Energy Industry Identification System (EIIS) codes and component function identifier codes appear as {SS/CC}

CONDITIONS PRIOR TO OCCURRENCE

At the time of the occurrence Salem Unit 1 was defueled and Salem Unit 2 was in Mode 5.

DESCRIPTION OF OCCURRENCE

On January 18, 1997 a review as a result of a recent NRC inspection determined that the Inservice Test (IST) surveillance on motor operated valves SJ4 {BP/V} and SJ5, Safety Injection Charging Pumps to Boron Injection Tank {BP/TK}, was not properly performed in the past. Emergency Operating Procedure (EOP) SGTR-1 requires the operators to close these valves to terminate safety injection during the steam generator tube rupture event. This method implements UFSAR Section 15.4.4 to terminate safety injection. The closure of these valves is an active safety function of the design basis of the plant. Because it is an active safety function, testing of these valves to close is required by Technical Specification 4.0.5 and must be included in the IST program.

Subsequent review of the SJ4 and SJ5 issue determined that there were 12 additional Unit 2 valves that were not being tested in the IST program in the direction contained in the EOPs. These 12 valves are 21CC16 {KB/V}, 22CC16, 2SJ12 {BP/V}, 2SJ13, 21SJ54, 22SJ54, 23SJ54, 24SJ54, 21CS36 {BE/V}, 22CS36, 21MS45 {SB/V} and 23MS45. The corresponding Unit 1 valves are likewise affected.

On February 15, 1997 further review determined that the IST surveillance on Component Cooling Water system check valves CC195 and CC210, was not performed as required. CC195 and CC210, which serve as a part of the ASME Class 3 boundary, were exempted from IST program testing in 1991 as a part of the IST Ten-year Update. This change was made under the provision that CC195 and CC210 remain isolated by closure of manual valves CC145 and CC146. Contrary to the requirements of the IST program, changes were made to the required positions of CC145 and CC146 to allow one of these valves to remain open to permit filling of the Component Cooling Water surge tank from the control room. Because these changes were made without consideration of IST program requirements, reverse flow testing of CC195 and CC210 to verify the integrity of the ASME Class 3 boundary was not performed.

CAUSE OF OCCURRENCE

The cause of the failure to perform the IST surveillance on the SJ4 and SJ5 valves was inadequate communication between the EOP group and the IST reviewers in determining what valves were manipulated in the EOPs and were therefore required to be included in the IST Program.

The cause of the failure to perform the IST surveillance on CC195 and CC210 was the lack of a programmatic interface between Operations department and IST program personnel to communicate changes to the normal positions of valves that could affect the IST program.

PRIOR SIMILAR OCCURRENCES

A review of LERs for Salem Units 1 and 2 for the past two years did not identify any reportable occurrences that were caused by an inadequate programmatic interface between the Operations department and IST program personnel to communicate changes to the normal positions of valves affecting the IST program.

SAFETY CONSEQUENCES AND IMPLICATIONS

There were no safety consequences associated with the occurrences in this LER. Evaluation of other testing performed on the identified valves provides confidence that the valves would have operated if needed. This is based on the following.

The 21CC16, 22CC16, 2SJ4, 2SJ5, 2SJ12, and 2SJ13 valves are in the GL 89-10 program and are stroke timed quarterly in the open direction.

The 21CS36 and 22CS36 valves are in the GL 89-10 program and open stroked during cold shutdown. After the open stroke test, the valve is returned to the closed position.

The 21SJ54, 22SJ54, 23SJ54, 24SJ54 valves are in the GL 89-10 Program and are operated when transitioning in and out of cold shutdown.

The 21MS45 and 23MS45 valves are manual valves and do not have any scheduled stroke tests. These valves are closed which provides assurance that they were capable of being closed in the past.

The 2CC195 and 2CC210 valves were radiographed to verify that they were closed. The results were satisfactory and the valves were determined to be operable.

The health and safety of the public was not affected.

CORRECTIVE ACTIONS

1. The Salem EOPs were reviewed for similar problems and the results are noted above.

2. The Operations Department Emergency/Abnormal Operating Procedure Program procedure, SC.OP-AP.ZZ-0113, will be revised to include IST notification of proposed changes. This will be completed by May 5, 1997.

3. As a result of the issues in this LER and other recently identified IST issues, a plan has been developed and will be completed to ensure that the Unit 2 IST Program is satisfactory prior to Unit 2 entering Mode 4.

4. The Salem Generating Station IST Manual will be revised to include the addition of the stroke test to the required valve tests for these valves. This will be completed by March 31, 1997.

5. The revised surveillance test for the identified valves will be performed prior to entering the applicable mode when the valve is required to be operable for Units 1 and 2.

6. A review of the normal valve positions in the IST Manual and the normal valve positions listed in the Tagging Request Information System (TRIS) was conducted to identify other discrepancies. Three other valve position discrepancies were identified. Appropriate changes were made to obtain agreement between the IST Manual and TRIS.

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

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

7. Procedure SC.RA-IS.ZZ-0007(Q), Exercise Closed Verification Check Valve Radiography, was revised to include quarterly radiography of 1CC195, 2CC195, 1CC210, and 2CC210 to verify that those valves are closed.

8. Salem procedure SC.OP-AP.ZZ-0103(Q) and Hope Creek procedure HC.OP-AP.ZZ-0103(Q) were revised to require that IST Program personnel review and approve valve position changes for valves in the IST program. (PIR 970220076, CRCA 05, CRCA 04).