

UPDATE REPORT - PREVIOUS REPORT DATE August 1, 1983

NRC FORM 358 (7-77)

*Update on containment isolation valves not included in surveillance procedure*

U. S. NUCLEAR REGULATORY COMMISSION

363

LICENSEE EVENT REPORT

NOV 16 1984

B&W

CONTROL BLOCK: 19541111 (PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

01 | P | A | T | M | I | 2 | 0 | 0 | - | 0 | 0 | 0 | 0 | 0 | - | 0 | 0 | 3 | 4 | 1 | 1 | 1 | 1 | 4 | 5

01 | REPORT SOURCE | L | 6 | 0 | 5 | 0 | 0 | 0 | 3 | 2 | 0 | 7 | 0 | 6 | 3 | 0 | 8 | 3 | 8 | 1 | 0 | 1 | 2 | 8 | 4 | 9

02 | During followup investigations for LER 83-19, the inability to verify Containment  
03 | Integrity, as per Recovery Operations Plan 4.6.1.1.a.1, was discovered for two  
04 | outboard containment penetrations (R-561 and R-565) due to the addition of  
05 | isolation valves without addition of these valves to the Surveillance Procedure.  
06 | No significant occurrence resulted from this event.  
07 |  
08 |

09 | SYSTEM CODE | S | D | 11 | CAUSE CODE | D | 12 | CAUSE SUBCODE | Z | 13 | COMPONENT CODE | Z | Z | Z | Z | Z | 14 | COMP. SUBCODE | Z | 15 | VALVE SUBCODE | Z | 16

17 | LER/RO REPORT NUMBER | 8 | 3 | 21 | 22 | SEQUENTIAL REPORT NO. | 0 | 2 | 3 | 24 | 26 | OCCURRENCE CODE | 0 | 1 | 27 | 29 | REPORT TYPE | X | 30 | 31 | REVISION NO. | 1 | 32 | COMPONENT MANUFACTURER | Z | 9 | 9 | 9 | 26

Rev. 0 on file

10-21-85 Wells

10 | Administrative procedures did not specifically require review and modification of  
11 | Surveillance Procedures prior to or simultaneously with tie-ins installed by  
12 | engineering changes. Immediate corrective action added the additional isolation  
13 | valves to the Surveillance Procedure. The administrative procedures were updated  
14 | to preclude recurrence.

15 | FACILITY STATUS | X | 28 | POWER | 0 | 0 | 0 | 29 | OTHER STATUS | Recovery Mode | 30 | METHOD OF DISCOVERY | A | 31 | DISCOVERY DESCRIPTION | Previous LER followup investigation | 32

16 | ACTIVITY CONTENT | Z | 33 | Z | 34 | AMOUNT OF ACTIVITY | N/A | 35 | LOCATION OF RELEASE | N/A | 36

17 | PERSONNEL EXPOSURES NUMBER | 0 | 0 | 0 | 37 | TYPE | Z | 38 | DESCRIPTION | N/A | 39

18 | PERSONNEL INJURIES NUMBER | 0 | 0 | 0 | 40 | DESCRIPTION | N/A | 41

19 | LOSS OF OR DAMAGE TO FACILITY TYPE | Z | 42 | DESCRIPTION | N/A | 43

20 | PUBLICITY ISSUED DESCRIPTION | N | 44 | DESCRIPTION | N/A | 45

8410230111 841012  
PDR ADDCK 05000320  
S PDR

NAME OF PREPARER Russ Wells PHONE (717) 948-8461

LER 83-023/O1X-1  
EVENT DATE - June 30, 1983

I. EXPLANATION OF THE OCCURRENCE

On June 29, 1983, while reviewing the compatibility of Surveillance Procedure 4301-M8 with this unit's Technical Specification Limiting Conditions, it was discovered that Surveillance Requirement 4.6.1.1.a.1, Verification of Containment Integrity, could not be met at Containment Penetrations R-561 and R-565. This occurrence was initiated by two distinct sequences. They were as follows:

On January 6, 1983, S-ECM 954, Revision 2, fabricated a spool piece and valves which were then installed on the outboard side of Penetration R-565. There were no changes initiated in the Surveillance Procedure, therefore, containment penetration integrity was not verified per that procedure. Similarly, on February 26, 1982, and September 20, 1982, S-ECM 963 installed a spool piece and valves on the outboard side of Penetration R-561. As with the case of Penetration R-565 above, Surveillance Procedure 4301-M8 was not updated.

On February 15, 1983, PCR 2-83-60 was incorporated into Surveillance Procedure 4301-M8. This PCR deleted valves DSA-V-005 and DSA-V-006 from the procedure. However, both valves remained installed on Penetration R-561. Therefore, containment penetration integrity was not verifiable per Surveillance Procedure 4301-M8.

II. CAUSE OF THE OCCURRENCE

Sequence No. 1 - The current procedures, AP 1021 and AP 1043, did not require Surveillance Procedure 4301-M8 to be updated prior to "tie-in" into R-561 and R-565. This resulted in modification of the containment integrity boundary with no ability to verify that change.

Sequence No. 2 - PCR 2-83-60 was written and issued without sufficient review against existing S-ECM's, associated drawings, and a system "walk-down" prior to implementation. This resulted in an inadequate Surveillance Procedure based on existing containment integrity boundaries.

III. CIRCUMSTANCES SURROUNDING THE OCCURRENCE

At the time of the occurrence, the Unit 2 facility was in a long-term cold shutdown state. The reactor decay heat was being removed via loss to ambient. Throughout the event there was no effect on the Reactor Coolant System or the core.

IV. CORRECTIVE ACTIONS TAKEN OR TO BE TAKEN

All existing isolation valves on Containment Penetrations R-561 and R-565 were added to Surveillance Procedure 4301-M8.

Long-Term Procedures AP 1021 and 1043 were revised on November 1, 1983, to prevent procedure non-compliance and Technical Specification violations between ECM "tie-in" and "turnover".

This event was discussed with Control Room Operators (CRO's) and Shift Foremen regarding the importance of approved, up-to-date drawings and ECM's used to originate, verify, and review procedures, TCN's, and PCR's. This was completed on August 11, 1983.

V. COMPONENT FAILURE DATA

N/A



**GPU Nuclear Corporation**  
Post Office Box 480  
Route 441 South  
Middletown, Pennsylvania 17057-0191  
717 944-7621  
TELEX 84-2386  
Writer's Direct Dial Number:

(717) 948-8461

4410-84-L-0045  
Document ID 0017A

October 12, 1984

US Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)  
Operating License No. DPR-73  
Docket No. 50-320  
Updated Licensee Event Reports

The Licensee Event Reports listed in Attachment 1 have been updated and are enclosed as Attachment 2 to this letter.

If you have any questions concerning this information, please contact Mr. J. J. Byrne of my staff.

Sincerely,

F. R. Standerfer  
Vice President/Director, TMI-2

FRS/RDW/jep

Attachments

cc: Regional Administrator - Office of I & E, Dr. T. E. Murley  
Program Director - TMI Program Office, Dr. B. J. Snyder  
Deputy Program Director - TMI Program Office, Mr. L. H. Barrett

8410230034 841012  
PDR ADQCK 05000320  
S PDR

GPU Nuclear Corporation is a subsidiary of the General Public Utilities Corporation

IE 22  
1/1

LER UPDATE PACKAGE

82-038/03L-1  
83-007/03X-1  
83-020/03X-1  
83-021/03X-1  
83-022/03X-1  
83-023/01X-1  
83-024/01X-1  
83-025/03X-1  
83-031/03X-1  
83-036/03X-2  
83-040/03X-1  
83-042/01X-1  
83-043/03X-1  
83-044/03X-1  
83-046/03X-1  
83-050/01X-1  
83-051/03X-1  
83-052/03X-1  
83-055/03X-1