, UPDATE REPORT - PREVIOUS REPORT DATE August 1, 1983 NAC FORMI 366 Update on containment inglation values u.s. NUCLEAR REGULATORY COMMISSION (7.77) not included in surveillance procedure NOV 1 6 1984 NOV 1 6 1984 CONTROL BLOCK: 1195141110 (PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION) - | 0 | 0 | 0 | 0 | 0 | - | 0 | 0] 3 4 | 1 | 1 | 1 | 1 0 57 CAT 58 PATMI 0 1 2 2 0 0 10LICENSEE CODE CON'T REPORT L 6 0 5 0 0 0 3 2 0 0 6 3 0 8 3 8 1 0 1 2 8 4 9 SOURCE 50 61 DOCKET NUMBER 56 69 EVENT DATE 74 75 REPORT DATE 80 0 1 EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10) | During followup investigations for LER 83-19, the inability to verify Containment | 0 2 Integrity, as per Recovery Operations Plan 4.6.1.1.a.1, was discovered for two 03 outboard containment penetrations (R-561 and R-565) due to the addition of 04 isolation valves without addition of these valves to the Surveillance Procedure 0 5 No significant occurrence resulted from this event 0 6 0 7 0 8 SYSTEM CODE CAUSE CAUSE COMP. SUBCODE SUBCODE COMPONENT CODE D (12) <u>__</u>___ Z (16) SIDICI Z (15) 0 9 13 18 REVISION OCCURRENCE REPORT SEQUENTIAL LER/RO EVENT YEAR REPORT NO. CODE NO. 17 REPORT $\left| 0 \right| 1$ 8 3 0 2 3 31 PRIME COMP. COMPON ACTION FUTURE METHOD HOURS (22) Z 2 N (24) Z_25 010 10 101 Z 9 9 1 36 CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27) Administriave procedures did not specifically require review and modification of 10 [1] Surveillance Procedures prior to or simultaneously with tie-ins installed by | engineering changes. Immediate corrective action added the additional isolation valves to the Surveillance Procedure. The administrative procedures were updated to preclude recurrence 80 FACILITY METHOD OF OTHER STATUS 30 DISCOVERY DESCRIPTION (32) X 28 0 0 0 29 Recovery Mode A 3 Previous LER followup investigation 9 ACTIVITY CONTENT 80 ELEASED OF RELEASE AMOUNT OF ACTIVITY (35) LOCATION OF RELEASE (36) N/A N/A 1 6 10 20 PERSONNEL EXPOSURES NUMBER TYPE DESCRIPTION (39) N/A 1 7 PERSONNEL INJURIES 30 DESCRIPTION (41) NUMBER 1 8 N/A 8410230111 841012 PDR ADDCK 05000320 OSS OF OR DAMAGE TO FACILITY (43) 11 12 14 TYPE DESCRIPTION PDR 1 9 N/A 10 PUBLICITY DESCRIPTION (45) NRC USE ONLY 2 0 N/A 10 68 80. 5 PHONE (717) 948-8461 Russ Wells NAME OF PREPARER

Attachment 2 4410-84-L-0045

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 oundaries.

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 values on Containment Penetrations R-561 and R-565 were added to Surveillance Procedure 4301-M8.

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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

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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.

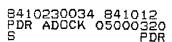
Sincerely,

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



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Attachment 1 4410-84-L-0045

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LER UPDATE PACKAGE

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