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NRC Form 368 (9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/85

LICENSEE EVENT REPORT (LER)

B&W.

FACILITY NAME (1) Three Mile Island Unit 2		DOCKET NUMBER (2) 0 5 0 0 0 3 2 1 0	PAGE (3) 1 OF 0 1 4
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TITLE (4)
Administrative Non-Compliance With Technical Specification 3.6.1.1 on containment isolation valve position

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											
0	3	2	7	8	5	8	5	0	0	0	6	0	4	0	5	8	5			
									DOCKET NUMBER(S) 0 5 0 0 0											
									0 5 0 0 0											

OPERATING MODE (9) N

POWER LEVEL (10) 0 | 0 | 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

20.402(b)	20.406(e)	50.73(a)(2)(iv)	73.71(b)
20.406(a)(1)(i)	50.36(e)(1)	50.73(a)(2)(v)	73.71(e)
20.406(a)(1)(ii)	50.36(e)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 368A)
20.406(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
20.406(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
20.406(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME Russell D. Wells, TMI-2 Licensing Engineer	TELEPHONE NUMBER 7 1 7 9 4 8 - 8 2 4 4
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

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

At 1720 hours on March 27, 1985, during a review of Surveillance Procedure 4301-M8, "Containment Integrity Verification - Recovery Mode", operator personnel discovered an administrative discrepancy concerning the operating procedure for isolation valve RR-V-20E.

Surveillance Procedure 4301-M8 defines the proper position of RR-V-20E as "open". However, Operating Procedure 2104-5.1, "R.B. Normal and Emergency Ventilation and Cooling", defines the proper position of RR-V-20E as "closed". Operating Procedure 2104-5.1 is the controlling administrative procedure for RR-V-20E and has been approved by the NRC.

RR-V-20E was in the "open" position prior to the TMI-2 accident and is currently inaccessible due to ALARA considerations. Therefore, it can be assumed that the position of this valve has not been altered since the TMI-2 accident.

If RR-V-20E is in the "open" position, as assumed, and an NRC-approved procedure does not exist which so authorizes, this condition constitutes noncompliance with Technical Specification 3.6.1.1. Thus, the event is reportable pursuant to 10 CFR 50.73 (a)(2)(i)(B).

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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TEXT (If more space is required, use additional NRC Form 368A's) (17)

I. PLANT OPERATING CONDITIONS BEFORE THE EVENT

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

II. STATUS OF STRUCTURES, COMPONENTS, OR SYSTEMS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

N/A

III. EVENT DESCRIPTION

At 1720 hours on March 27, 1985, during a review of Surveillance Procedure 4301-M8, "Containment Integrity Verification - Recovery Mode", Operations Personnel discovered an administrative discrepancy concerning the operating procedure for isolation valve RR-V-20E (IEEE Code-JM).

RR-V-20E is an instrument isolation valve located on the inboard side of penetration R-588 for the Reactor Building (RB) cooling coils.

This isolation valve is located in the 280' elevation of the RB; thus, the position of the valve cannot be verified due to ALARA considerations. However, it is known that RR-V-20E was open prior to the accident; therefore, it can be assumed that the position of this valve has not been altered.

Surveillance Procedure 4301-M8 defines the proper position of RR-V-20E as "open". This procedure references Operating Procedure 2104-5.1, "R.B. Normal and Emergency Ventilation and Cooling" as the controlling administrative procedure for allowing valve RR-V-20E to be open.

However, the valve lineup in 2104-5.1 indicates the position of RR-V-20E as "closed".

A review of this event determined the following:

- . Revision 0 of 2104-5.1, dated June 23, 1977, lists the position of RR-V-20E as "open". At the time of issue of this procedure, NRC approval was not required and was not sought.
- . Revisions 1 through 15 (the current revision) of 2104-5.1 list the position of RR-V-20E as "closed".

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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TEXT (If more space is required, use additional NRC Form 386A's) (17)

- The Procedure Change Request (PCR) which modified Revision 0 of 2104-5.1 to Revision 1 lists the position of RR-V-20E as "open". Therefore, it appears that during the process of publication of Revision 1 of 2104-5.1, the position of RR-V-20E was erroneously listed as "closed".
- The NRC's approval of 2104-5.1 initially appeared on Revision 7, dated August 28, 1980. This revision also listed the position of RR-V-20E as "closed".

TMI-2 Technical Specification 3.6.1.1, "Containment Integrity" requires that "Primary Containment Integrity shall be maintained unless it is not required per procedures approved pursuant to Specification 6.8.2." Technical Specification 6.8.2 requires, in part, NRC approval.

Therefore, the condition in which containment isolation valve RR-V-20E is "open" without an NRC-approved procedure so authorizing constitutes noncompliance with Technical Specification 3.6.1.1.

This event is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B), "... any operation or condition prohibited by the plant's Technical Specifications".

IV. ROOT CAUSE OF THE EVENT

The root cause of this event, as previously stated in the event description, was an apparent typographical error which resulted in the proper position of RR-V-20E being listed as "closed" vice "open" in Revision 1 to 2104-5.1.

The acceptance criteria for 4301-M8 states, "If valve is allowed open under administrative controls, verify that the operating procedure which required the valve to be open is current and approved per Technical Specification 6.8.2."

Therefore, a contributing cause of this event was the failure of personnel performing 4301-M8 to verify whether the controlling administrative procedure for RR-V-20E was consistent with 4301-M8 and met the above stated acceptance criteria.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

V. CORRECTIVE ACTIONS PLANNED

Short-Term

Immediately upon discovery of this event, RR-V-20E was declared inoperable. The containment isolation valves located outside the affected penetrations were closed and deactivated in accordance with the action statement of Technical Specification 3.6.1.1.

A Quality Deficiency Report (QDR) has been issued by the Operations Department to document this event.

Additionally, the importance of performing 4301-M8 in strict accordance with the procedural requirements has been stressed to Operations personnel via a Plant Operations memorandum.

Long-Term

Operating Procedure 2104-5.1 was revised on April 19, 1985, to change the required position of RR-V-20E from "closed" to "open". The revision received NRC approval. RR-V-20E was declared operable at 1500 hours on April 19, 1985.

VI. COMPONENT FAILURE DATA

N/A

VII. AUTOMATIC OR MANUALLY INITIATED SAFETY SYSTEM RESPONSES

N/A

VIII. ASSESSMENT OF THE SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT

As previously stated, this event resulted from an apparent administrative error. Isolation valve RR-V-20E has been inaccessible since the TMI-2 accident due to ALARA considerations and is assumed to have been open throughout the post-accident period.

It is noteworthy that other inboard and outboard isolation valves identical to RR-V-20E are allowed to be open in accordance with NRC approved procedure.

Therefore, this event had no effect on the health and safety of the public.



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April 25 1985

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
Licensee Event Report 85-06

Attached is Licensee Event Report 85-06 concerning an administrative noncompliance with TMI-2 Technical Specification 3.6.1.1. This condition was discovered on March 27, 1985.

This event is considered reportable pursuant to Title 10 of the Code of Federal Regulations, Section 50.73(a)(2)(i)(B).

Sincerely,

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

FRS/RDW/eml

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, Dr. W. D. Travers

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