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NRC Form 366 (9-83)

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

B&W

# LICENSEE EVENT REPORT (LER)

198270

FACILITY NAME (1): Three Mile Island Unit 2

DOCKET NUMBER (2): 0 5 0 0 0 3 2 0

PAGE (3): 1 OF 0 4

TITLE (4): Failure to Test ~~the TMI-2~~ Fire ~~Suppression~~ Water System 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 NAMES | DOCKET NUMBER(S) |
| 0 5 | 0 1 | 8 5 | 8 5 | — 0 1 0 | — 0 0 | 1 2 | 2 4 | 8 5 | TMI-1 | 0 5 0 0 0 2 8 9 |
| | | | | | | | | | | 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) | 20.405(c) | 50.73(a)(2)(iv) | 73.71(b) |
| 20.405(a)(1)(i) | 50.36(c)(1) | 50.73(a)(2)(v) | 73.71(c) |
| 20.405(a)(1)(ii) | 50.36(c)(2) | 50.73(a)(2)(vii) | OTHER *(Specify in Abstract below and in Text, NRC Form 366A)* |
| 20.405(a)(1)(iii) | X 50.73(a)(2)(i) | 50.73(a)(2)(viii)(A) | |
| 20.405(a)(1)(iv) | 50.73(a)(2)(ii) | 50.73(a)(2)(viii)(B) | |
| 20.405(a)(1)(v) | 50.73(a)(2)(iii) | 50.73(a)(2)(x) | |

LICENSEE CONTACT FOR THIS LER (12)

NAME: John C. Auger, TMI-2 Licensing Auger

TELEPHONE NUMBER — AREA CODE: 7 1 7 — 9 4 8 - 8 2 4 4

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)* — X NO

EXPECTED SUBMISSION DATE (15): MONTH | DAY | YEAR

5-2-86 Denied

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


On November 25, 1985, at 1705 hours, it was determined that the TMI-2 Recovery Operations Plan Surveillance Test Requirement 4.7.10 for the cycling of Fire Suppression Water System (IEEE Code-KP) valves in Unit 2 had not been performed at the required interval. The test was due by May 1, 1985, however, it was not performed. This surveillance was identified as overdue on November 25, 1985, while performing a Quality Assurance Audit. The failure to perform the surveillance test resulted in the Fire Suppression Water System being declared inoperable. The Fire Suppression Water System is required to be operable by TMI-2 Technical Specification Limiting Condition for Operation 3.7.10.1.c.

The root cause of this event was poor communication between the scheduler of the surveillance test and those responsible to perform it. The TMI-1 Surveillance Scheduler schedules this test for both the TMI-1 and TMI-2 valves. In this case, TMI-1 and TMI-2 did not communicate adequately. A contributing cause was the lack of procedural controls delineating this communication between units.

The immediate corrective action taken was to perform the required cycling of valves. The long term corrective actions included a revision to the surveillance procedures shared by the two (2) units to require better communication between the Shift Foreman of each unit if a fire system surveillance is being performed and the scheduling of all TMI-2 required portions of tests separately in TMI-2.


IE22 1/1



NRC Form 366 (9-83)

I. PLANT OPERATING CONDITIONS BEFORE THE EVENT

The TMI-2 facility was in a long-term cold shutdown state; the defueling evolution is in progress. 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

On November 25, 1985, at 1705 hours, it was determined by a Quality Assurance Auditor that the TMI-2 Recovery Operation Plan (ROP) surveillance test requirements 4.7.10.1.1.d.2 and 4.7.10.2.a for the annual cycling of Fire Suppression Water System valves in TMI-2 had not been completed on time. The test was to have been completed no later than May 1, 1985. This surveillance involves cycling each testable valve in the flowpath through at least one (1) complete cycle of travel. The test is performed via Station Surveillance Procedure 3303-A1, "Fire System Valve Cycling." Station Surveillance Procedures cover systems/equipment which are required to be operable in both Unit 1 and Unit 2. By not performing the Unit 2 portion of the Station Surveillance Procedure at the specified interval, the unit violated the TMI-2 Technical Specification (Tech. Spec.) Limiting Condition for Operation (LCO) 3.7.10.1.c. This LCO requires that an operable flowpath exist for the Fire Suppression Water System with sectionalizing control and/or isolation valves. By not performing this test, the ability to have sectionalized control was not maintained and the Fire Suppression Water System was declared inoperable. This event is considered reportable per 10 CFR 50.73(a)(2)(i)(B) due to a condition prohibited by the plant's Technical Specification.

The date for this event is May 1, 1985, however, this condition was not identified until November 25, 1985; hence, the report is due December 25, 1985.

IV. ROOT CAUSE OF THE EVENT

The root cause of this event was personnel error due to a lack of adequate communication between the TMI-1 scheduler and the TMI-2 organization responsible for performance of the test. A contributing cause was the lack of procedural controls identifying/outlining inter-unit communications.

The TMI-1 surveillance scheduler had the responsibility to schedule both the TMI-1 and TMI-2 portions of the surveillance test 3303-A1. The test was scheduled to be performed between December 12, 1984, and May 1, 1985. The TMI-1 portion of the test was completed on January 31, 1985. At this time, TMI-1 should have contacted the TMI-2 Shift Supervisor/Shift Foreman and informed him of the need to perform the TMI-2 portion of the valve cycling test. In discussions with the TMI-2 Shift Supervisor/Shift Foreman, it could not be determined if the TMI-2 Control Room had been notified. No record of this notification can be found.

V. CORRECTIVE ACTIONS

Immediate

The overdue surveillance was immediately commenced to demonstrate the system's operability. This test was satisfactorily completed on November 28, 1985, at 0600 hours.

Long Term

Where both Units are required to perform sections of a station surveillance, it will be scheduled by both Units' surveillance schedulers. This will ensure that both Units' schedulers will be directly aware of Station Surveillance due dates. Also, there are twelve (12) Fire System Station Surveillances which are shared by TMI-1 and 2. These procedures will be revised to ensure better communication between the TMI-1 and TMI-2 Control Rooms when the required surveillances are performed.

VI. COMPONENT FAILURE DATA

N/A

VII. AUTOMATIC OR MANUALLY INITIATED SAFETY SYSTEM RESPONSES

N/A

| FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) | | | PAGE (3) |
|---|---|---|---|---|---|
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | |
| Three Mile Island Unit 2 | 0 5 0 0 0 3 2 0 | 8 5 | — 0 1 0 | — 0 0 | 0 4 OF 0 4 |

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

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

The purpose of the Fire Suppression Water System Valve Cycling is to demonstrate that sectionalizing control of the system exists. The system also receives a monthly valve lineup verification to ensure that the capability exists to get water to an area and an annual main header flush and loop test to ensure minimum flowrate requirements. Both of these test performances are current and have been performed satisfactorily. The current status of these tests serves to mitigate the impact of the late performance of the valve cycling.

This event did not present a significant safety hazard nor could it have prevented maintenance of TMI-2 in cold shutdown condition.

Nuclear

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4410-85-L-0251
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December 24, 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 85-10

Attached is Licensee Event Report 85-10 concerning the failure to test the TMI-2 Fire Suppression Water System Valves. This event was determined to be reportable on November 25, 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. Standenmeyer
Vice President/Director, TMI-2

FRS/JCA/eml

Attachments

cc: Regional Administrator - Office of I & E, Dr. T. E. Murley
Director - TMI-2 Cleanup Project Directorate, Dr. W. D. Travers

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