ENERGY NORTHWEST

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November 19, 2012
GO2-12-170

10 CFR 50.73

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397**
LICENSEE EVENT REPORT NO. 2012-006-00

Dear Sir or Madam:

Transmitted herewith is Licensee Event Report No. 2012-006-00 for Columbia Generating Station. This report is submitted pursuant to 10 CFR 50.73(a)(2)(v). The attached report discusses being in a condition that could have prevented the fulfillment of the safety function of systems that are needed to remove residual heat and to mitigate the consequences of an accident.

There are no commitments being made to the NRC by this letter. If you have any questions or require additional information, please contact Mr. ZK Dunham at (509) 377-4735.

Respectfully,

WG Hettel
Vice President, Operations

Attachment: Licensee Event Report 2012-006-00

cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Senior Resident Inspector/988C
AJ Rapacz – BPA/1399
WA Horin – Winston & Strawn

IE22
NRR

NRC FORM 366 (10-2010) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104 EXPIRES 10/31/2013

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA/Privacy Section (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects.resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose 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)

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4. TITLE

Both Divisions of SDC Isolation Valves Made Inoperable

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER 05000
09	19	2012	2012	– 006 –	0	11	19	2012	FACILITY NAME	DOCKET NUMBER 05000

9. OPERATING MODE

1

10. POWER LEVEL

100

11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: *(Check all that apply)*

☐ 20.2201(b)	☐ 20.2203(a)(3)(i)	☐ 50.73(a)(2)(i)(C)	☐ 50.73(a)(2)(vii)
☐ 20.2201(d)	☐ 20.2203(a)(3)(ii)	☐ 50.73(a)(2)(ii)(A)	☐ 50.73(a)(2)(viii)(A)
☐ 20.2203 (a)(1)	☐ 20.2203(a)(4)	☐ 50.73(a)(2)(ii)(B)	☐ 50.73(a)(2)(viii)(B)
☐ 20.2203(a)(2)(i)	☐ 50.36(c)(1)(i)(A)	☐ 50.73(a)(2)(iii)	☐ 50.73(a)(2)(ix)(A)
☐ 20.2203(a)(2)(ii)	☐ 50.36(c)(1)(ii)(A)	☐ 50.73(a)(2)(iv)(A)	☐ 50.73(a)(2)(x)
☐ 20.2203(a)(2)(iii)	☐ 50.36(c)(2)	☐ 50.73(a)(2)(v)(A)	☐ 73.71(a)(4)
☐ 20.2203(a)(2)(iv)	☐ 50.46(a)(3)(ii)	☒ 50.73(a)(2)(v)(B)	☐ 73.71(a)(5)
☐ 20.2203(a)(2)(v)	☐ 50.73(a)(2)(i)(A)	☐ 50.73(a)(2)(v)(C)	☐ OTHER
☐ 20.2203(a)(2)(vi)	☐ 50.73(a)(2)(i)(B)	☒ 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME	TELEPHONE NUMBER *(Include Area Code)*
Motley Hedges	509-377-8277

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

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED

☒ YES *(If yes, complete 15. EXPECTED SUBMISSION DATE)* ☐ NO

15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
	01	21	2013

ABSTRACT *(Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)*

On September 19, 2012, Energy Northwest (EN) identified that both divisions of Residual Heat Removal (RHR) Shutdown Cooling (SDC) Reactor Vessel isolation valves were inappropriately made inoperable at the same time on multiple occasions in support of maintenance and surveillance testing during the 2011 refueling outage (R-20). This planned inoperability of the SDC isolation valves was performed using procedure SOP-RHR-SDC-BYPASS. SOP-RHR-SDC-BYPASS contains the specific steps for preventing the closure of each of the SDC isolation valves and the subsequent restoration steps. SOP-RHR-SDC-BYPASS did not contain guidance to allow both divisions SDC isolation valves to be inoperable at the same time. Since both divisions of SDC isolation valves were made inoperable without procedural guidance, this is being reported as a condition that could have prevented the fulfillment of the safety function of systems that are needed to remove residual heat and to mitigate the consequences of an accident.

An evaluation in accordance with the corrective action program is currently in progress. A supplemental report will be submitted to add additional details concerning the evaluation's conclusions and corrective actions.

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NARRATIVE

Plant Conditions:

Event Description:

On September 19, 2012, Energy Northwest (EN) identified that both divisions of Residual Heat Removal (RHR) Shutdown Cooling (SDC) Reactor Vessel isolation valves were inappropriately made inoperable at the same time on multiple occasions in support of maintenance and surveillance testing during the 2011 refueling outage (R-20). This issue was identified and entered into the Columbia Generating Station (Columbia) corrective action program following review of the NRC Operating Experience Smart Sample (OpESS) 2012/02, Revision 1. All required technical specification conditions for inoperable primary containment isolation valves were entered when the valves were made inoperable, and compliance with actions was maintained. No operations with a potential to drain the reactor vessel were in progress. Columbia was in Mode 5 with the vessel flooded up. During R-20, EN implemented a plant modification to change the Group 1 isolation valves reactor water level signal from level 2 to level 1. The NRC granted permission for this change to technical specifications (TS) in a letter dated August 18, 2009 (TAC NO. MD9598). This planned inoperability of the SDC isolation valves, in support of the maintenance and surveillance activities associated with the modification to change the isolation signal from level 2 to level 1, was performed using procedure SOP-RHR-SDC-BYPASS. SOP-RHR-SDC-BYPASS contains the specific steps for preventing the closure of each of the SDC isolation valves and the subsequent restoration steps. SOP-RHR-SDC-BYPASS did not contain guidance to allow both divisions of SDC isolation valves to be inoperable at the same time. Since both divisions of the SDC isolation valves were made inoperable and the approved procedure did not provide specific guidance for removal of both divisions at the same time, this is being reported as a condition that could have prevented the fulfillment of the safety function of systems that are needed to remove residual heat and to mitigate the consequences of an accident. This condition is reportable under 10 CFR 50.73(a)(2)(v)(B) and 50.73(a)(2)(v)(D).

Extent of Condition:

An extent of condition review was performed. The only instances of both divisions of RHR SDC isolation valves being inoperable at the same time was during R-20. There were multiple instances in which this occurred in R-20.

Immediate Corrective Action:

No immediate corrective action was required.

Cause:

The correction action process to determine a cause is still in progress. This information will be provided in the supplemental report.

Operating Experience & Previous Occurrences:

This had not previously occurred at Columbia.

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NARRATIVE

Further Corrective Actions:

The correction action process to determine corrective actions is still in progress. This information will be provided in the supplemental report.

Assessment of Safety Consequences:

Each occurrence took place when the plant was in Mode 5 with the reactor vessel in a flooded condition. No operations with a potential to drain the vessel were in progress. The inoperability of the RHR SDC isolation valves was not due to equipment failure. If a loss of reactor level was detected, the isolation valves could be quickly restored to an operable condition. All required TS conditions were entered. Compliance with all TS actions was maintained. There was no significant impact on safety consequences.

Energy Industry Identification System (EIIS) Information

EIIS codes are bracketed [] where applicable in the narrative.