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ComEd

March 14, 2000

SVP-00-049

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

Quad Cities Nuclear Power Station, Unit 1
Facility Operating License Nos. DPR-29
NRC Docket Nos. 50-254

Subject: Time Delay Relays not Calibrated at the Frequency Required by Technical Specifications

Enclosed is Licensee Event Report (LER) 254/00-002, Revision 00, for Quad Cities Nuclear Power Station.

This report is submitted in accordance with the requirements of the Code of Federal Regulations, Title 10, Part 50.73(a)(2)(i)(B). The licensee shall report any operation or condition prohibited by the plant's Technical Specifications.

We are committing to the following action:

A supplemental LER will be submitted after completion of the root cause determination.

Any other actions described in the submittal represent intended or planned actions by Commonwealth Edison (ComEd) Company. They are described for the NRC's information and are not regulatory commitments.

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Should you have any questions concerning this letter, please contact Mr. C.C. Peterson at (309) 654-2241, extension 3609.

Respectfully,

George P. Barnes for

Joel P. Dimmette, Jr.
Site Vice President
Quad Cities Nuclear Power Station

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station

LICENSEE EVENT REPORT (LER)			Form Rev. 2.0
Facility Name (1)	Docket Number (2)		Page (3)
Quad Cities Unit 1	0 5 0 0 0 2 5 4		1 of 0 3

Title (4)
Time Delay Relays not Calibrated at the Frequency Required by Technical Specifications

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 3	1 5	2000	2000	0 0 2	0 0	0 3	1 4	2000		0 5 0 0 0 2 6 5
										0 5 0 0 0

OPERATING MODE (9)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)					
1	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)		
POWER LEVEL (10) 1 0 0	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		
	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)(viii)(B)			
	20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)			

LICENSEE CONTACT FOR THIS LER (12)	
Name	TELEPHONE NUMBER
	AREA CODE
Charles Peterson, Regulatory Affairs Manager, ext. 3609	3 0 9 6 5 4 - 2 2 4 1

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)		Expected Submission Date (15)	Month	Day	Year
X YES (If yes, complete EXPECTED SUBMISSION DATE)	NO		0 4	1 4	2000

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

ABSTRACT:

On February 15, 2000, at 2115 hours, during a review of the Improved Technical Specification submittal, it was determined that the calibration frequency for the Main Steam Pressure - Low Primary Containment Isolation time delay relays was 18 months. Technical Specifications (TS) Table 4.2.A-1, "Isolation Actuation Instrumentation Surveillance Requirements," requires channel calibration to be on a quarterly frequency. In addition, on February 16, 2000, at 1830 hours, it was determined that the calibration frequency for the Reactor Core Isolation Cooling system time delay relays was also 18 months, while TS Table 4.2.A-1 required channel calibration to be on a quarterly frequency.

Upon discovery, the surveillances were performed for the affected time delay relays with satisfactory results.

The root cause determination for this event has not been completed. A supplemental report will be submitted after the root cause determination has been completed.

The safety significance of this event was minimal. The associated instrument channels were capable of performing their functions.

PLANT AND SYSTEM IDENTIFICATION:
General Electric - Boiling Water Reactor - 2511 MWt rated core thermal power.

EVENT IDENTIFICATION:
Time Delay Relays not Calibrated at the Frequency Required by Technical Specifications

A. CONDITIONS PRIOR TO EVENT:

Unit:	1 and 2	Event Date:	February 15, 2000	Event Time:	2115
Reactor Mode:	1	Mode Name:	Power Operation	Power Level:	100%

This report was initiated by Licensee Event Report 254/00-002

Power Operation (1) - Mode switch in the RUN position with average reactor coolant temperature at any temperature.

B. DESCRIPTION OF EVENT:

This LER is being submitted in accordance with 10 CFR 50.73 (a)(2)(i)(B), which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications.

On February 15, 2000, during the preparation of the Improved Technical Specifications submittal, it was discovered that the Main Steam Line Pressure - Low signal to Primary Containment Isolation contained a time delay relay downstream of the pressure switch. The review indicated that this time delay device was not being calibrated on a quarterly frequency, but was being calibrated on an 18-month frequency with the logic system functional testing. The Technical Specifications do not specifically include this time delay requirement in the surveillance requirements.

The original Technical Specifications (TS) contained a definition of Instrument Calibration, which included the following statement: "Response time is not part of the routine instrument calibration, but will be checked once per cycle." This statement was implemented by calibrating the time delay relays during system Logic Testing conducted once per 18 months. The current TS were implemented on September 23, 1996 and the definition of Instrument Calibration was changed to be consistent with the Standard TS definition "Channel Calibration" and thus the statement addressing response time was removed. Although this statement was removed, the station continued calibrating the time delays during system logic testing. These time delay relays are designed to prevent spurious isolations of the affected systems.

Review among Quad Cities, Dresden station and Corporate Regulatory Services determined that the Channel as referred to in the Technical Specifications (TS) Section 1.0, "Definitions," for Channel Calibrations should be understood to include the circuit's time delay devices.

At 2115 hours, on February 15, 2000, Unit 1 entered the 24 hour Action Statement for the Main Steam Pressure - Low function, per TS 4.0.C, to perform testing. At 0535 hours on February 16, 2000, the testing was satisfactorily completed and Action Statement 4.0.C was exited. The associated Unit 2 Main Steam Pressure-Low time delay relays [JM] were successfully tested within 92 days frequency during the recent refueling outage.

Following the February 15, 2000, discovery, site personnel performed an extensive review of the instrumentation channel logic and associated calibration frequency requirements to determine if there were any additional items that had incorrect surveillance frequencies. This review identified one additional item on February 16, 2000, associated with the time delay relay for the Reactor Core Isolation Cooling (RCIC) [BN] system Steam Flow - High. At 1830 hours, on February 16, 2000, Actions associated with TS 4.0.C were re-entered for the RCIC time delay relays for both Unit 1 and Unit 2. At 2335 hours surveillances for both units were completed satisfactorily and the Action Statements were exited.

C. CAUSE OF THE EVENT:

The determination of the root cause associated with the failure to complete the calibration of the time delay relays within the Technical Specification required surveillance interval is not complete. A supplemental LER will be submitted upon completion of the root cause determination.

D. SAFETY ANALYSIS:

Although the time delay setpoint of the time delay relay devices was not calibrated on a 92 day basis, the relays did change state as part of the functional test surveillances for the associated pressure switches. Additionally, when calibrated following discovery of this condition, they were found to be within the acceptance limits. The instruments were therefore capable of performing their design function. For these reasons, the safety significance of this event was minimal.

E. CORRECTIVE ACTIONS:

Corrective Actions Completed:

Upon discovery, the appropriate TS Surveillances were performed for the affected time delay relays with satisfactory results.

Corrective Actions to be Completed:

Corrective actions will be developed as part of the determination of the root cause. A supplemental LER will be submitted after completion of the root cause determination.

F. PREVIOUS OCCURRENCES:

Previous occurrences will be assessed as part of the root cause determination.

G. COMPONENT FAILURE DATA:

Component failure data, if required, will be presented in the supplemental LER.