



**Pacific Gas and
Electric Company**

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June 30, 2000

PG&E Letter DCL-00-097

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

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Licensee Event Report 1-2000-006-00
Technical Specification 3.4.9.1 Not Met due to an Inadequate Procedure

Dear Commissioners and Staff:

PG&E is submitting the enclosed licensee event report regarding Technical Specification 3.4.9.1, "Reactor Coolant System Pressure/Temperature Limits," not being met due to an inadequate procedure.

This event was not risk significant and did not adversely affect the health and safety of the public.

Sincerely,

R. A. Walter for
David H. Oatley

cc: Steven D. Bloom
Ellis W. Merschoff
David L. Proulx
Diablo Distribution
INPO

Enclosure

ZTR/2246/A0509122

IE22

LICENSEE EVENT REPORT (LER)

| | | |
|--|---|---------------------------|
| FACILITY NAME (1) Diablo Canyon Unit 1 | DOCKET NUMBER (2) 0 5 0 0 0 2 7 5 | PAGE (3) 1 OF 5 |
|--|---|---------------------------|

TITLE (4)
Technical Specification 3.4.9.1 Not Met due to an Inadequate Procedure

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|----------------|-----------|-------------|----------------|----------------------|-----------------|-----------|-----------------|-------------|-----------------------------|-------------------------------|------------------------|--|--|
| EVENT DATE (5) | | | LER NUMBER (6) | | | | REPORT DATE (7) | | | OTHER FACILITIES INVOLVED (8) | | | |
| MO | DAY | YEAR | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | MO | DAY | YEAR | FACILITY NAME | | DOCKET NUMBER | | |
| 05 | 26 | 2000 | 2000 | - 0 0 6 - 0 0 | 0 0 | 06 | 30 | 2000 | Diablo Canyon Unit 2 | | 0 5 0 0 0 3 2 3 | | |

| | | |
|--|---|-------------|
| OPERATING MODE (9) 3 | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR: (11) | |
| POWER LEVEL (10) 0 0 0 | X 10 CFR 50.73(A)(2)(i)(B) | OTHER _____ |
| (SPECIFY IN ABSTRACT BELOW AND IN TEXT, NRC FORM 366A) | | |

LICENSEE CONTACT FOR THIS LER (12)

| | |
|--|---|
| Roger Russell - Senior Regulatory Services Engineer | TELEPHONE NUMBER |
| | AREA CODE: 805 NUMBER: 545-4327 |

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 |
|-------|--------|-----------|--------------|--------------------|-------|--------|-----------|--------------|--------------------|
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| SUPPLEMENTAL REPORT EXPECTED (14) | EXPECTED SUBMISSION DATE (15) | MON | DAY | YR |
| <input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) | <input checked="" type="checkbox"/> NO | | | |

ABSTRACT (Limit to 1400 spaces. i.e., approximately 15 single-spaced typewritten lines.) (16)

On May 25, 2000, with Unit 1 in Mode 3 (Hot Standby), the Limiting Condition for Operation for Technical Specification 3.4.9.1, "Reactor Coolant System Pressure/Temperature Limits," was not met when operators did not adequately document hourly, compliance with Surveillance Requirement 4.4.9.1 during system heatup.

On May 31, 2000, this condition was discovered by a utility employee performing a quality assessment.

The condition was caused by an inadequate procedure. The procedure was revised February 19, 1999 to allow an alternate means of satisfying the surveillance requirement, but the revision did not adequately stipulate that a licensed operator document hourly that temperatures and pressures were within limits. The surveillance requirement was not met due to inadequate documentation, not an actual violation of temperature/pressure limits. The condition is assumed to have occurred on subsequent heatups and cooldowns on both units.

The procedures will be revised to ensure adequate documentation of compliance with the surveillance requirement during reactor coolant system heatup and cooldown.

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| Diablo Canyon Unit 1 | 0 | 5 | 0 | 0 | 0 | 2 | 7 | 5 | 2000 | - | 0 | 0 | 6 | - | 0 | 0 | 2 | OF | 5 |

TEXT

I. Plant Conditions

Units 1 and 2 were in Mode 3 (Hot Standby) at 0 percent power during heatup/cooldown.

II. Description of Problem

A. Background

Technical Specification (TS) 3.4.9.1, Limiting Condition for Operation (LCO) "Reactor Coolant System Pressure/Temperature Limits," require heatup and cooldown rates to a maximum of 100 degrees F in any 1-hour period.

TS 4.4.9.1, Surveillance Requirements "Reactor Coolant System Pressure/Temperature Limits," states that "The Reactor Coolant System temperature and pressure shall be determined to be within the limits at least once per hour during system heatup ..."

Operating Procedure (OP) L-1, "Plant Heatup from Cold Shutdown to Hot Standby," implements TS 4.4.9.1 Surveillance Requirements during heatup.

OP L-5, "Plant Cooldown from Minimum Load to Cold Shutdown," implements TS 4.4.9.1 Surveillance Requirements during cooldown.

Safety parameter display system (SPDS) provides operators with a graphical display of reactor coolant system (RCS) temperature and pressure as well as the TS limits.

Plant process computer (PPC) [ID] provides an independent calculation of parameters including RCS pressure and temperature in a tabular format.

B. Event Description

On May 25, 2000, plant operators were performing OP L-1 on Unit 1 in preparation for entering Mode 1. Based on discussions with operations personnel, the operators were continuously monitoring SPDS to verify that RCS [AB] pressure and temperature [IM] were within the limits specified in TS 3.4.9.1. However, the operators did not document their review of the data hourly, as required by TS 4.4.9.1. The operators gathered PPC

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printouts of the pressure and temperature data two to three times per shift.

Throughout heatup, the RCS pressure and temperature values met the TS limits.

Similar events with lack of hourly documentation of RCS temperature and pressure during heatups and cooldowns occurred on Unit 1 on March 12, 1999 and May 17, 2000; and on Unit 2 on September 26, 1999 and October 25, 1999.

C. Inoperable Structures, Components, or Systems that Contributed to the Event

None.

D. Other Systems or Secondary Functions Affected

None.

E. Method of Discovery

A former senior reactor operator (SRO) working in the quality organization performed an assessment of operations unit startup activities.

F. Operator Actions

None.

G. Safety System Responses

None.

III. Cause of the Problem

A. Immediate Cause

The immediate cause of this event was determined to be an inadequate procedure. Although OP L-1 provided for the documenting of RCS parameters in accordance with the TS surveillance requirements, the

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documentation was done automatically using the PPC, and the procedure did not require periodic review of this data by the operator.

B. Root Cause

The root cause of this event was determined to be a human error on the part of the procedure sponsor who revised OP L-1 on February 19, 1999. The procedure was revised to incorporate an enhancement to make use of computerized logging of RCS temperature, pressure, and heatup rate. While understanding that the purpose of the logging was to meet the requirements of the surveillance, the sponsor overlooked the fact that manual logging of the data was credited as a review of that data, whereas automatic data collection requires review before the intent of the surveillance requirement can be met.

C. Contributory Cause

None.

IV. Analysis of the Event

Since the TS pressure and temperature limits were continuously monitored and subsequently verified to have been met by review of the PPC data, there were no actual safety consequences involved in these events.

Thus, the event is not considered risk significant and it did not adversely affect the health and safety of the public.

Also, the condition is not considered a Safety System Functional Failure.

The condition was evaluated using the NRC's Significance Determination Process in accordance with NRC Inspection Manual Chapter 0609, and was screened out as green.

V. Corrective Actions

A. Immediate Corrective Actions

None.

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TEXT

B. Corrective Actions to Prevent Recurrence

OP L-1 and OP L-5 will be revised to ensure adequate documentation of compliance with the surveillance requirement RCS heatup and cooldown.

VI. Additional Information

A. Failed Components

None.

B. Previous Similar Events

None.

COMMITMENT TRACKING MEMO

(Remove prior to NRC submittal)

Document: PG&E Letter DCL-00-097

Subject: Technical Specification 3.4.9.1 Not Met due to an Inadequate Procedure

File Location: S:/RS/RA/GRP_WORK/LER/2000/dcl00097.doc

Commitment #1. OP L-1 and OP L-5 will be revised to ensure adequate documentation of compliance with the surveillance requirement during Reactor Coolant System heatup and cooldown.

Clarification: None.

| | | |
|--|---------------------------------------|--|
| <i>Tracking Document:</i> | <small>AR or NCR</small> A0509112 | <small>AE or ACT</small> |
| <i>Assigned To:</i> | <small>NAME</small> P. Snavelly | <small>ORGANIZATION CODE</small> pgof |
| <i>Commitment Type:</i> | <small>FIRM OR TARGET</small> Firm | <small>DUE DATE:</small> 7/14/00 |
| <i>Outage Commitment?</i> | <small>YES OR NO</small> No | <small>IF YES, WHICH? (E.G., 2R9, 1R10, ETC.)</small> |
| <i>PCD Commitment?</i> | <small>YES OR NO</small> No | <small>IF YES, LIST THE IMPLEMENTING DOCUMENTS (IF KNOWN)</small> |
| <i>Duplicate of New NCR Commitment in PCD?</i> | <small>YES OR NO</small> No | <small>IF YES, LIST PCD NUMBER (e.g., T35905, etc.)</small> |
| <i>Old PCD Commitment being changed?</i> | <small>YES OR NO</small> No | <small>1. IF YES, LIST PCD NUMBER, AND</small> <small>2. CLARIFY TO CLERICAL HOW COMMITMENT TO BE REVISED</small> |