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Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Docket No. 50-277
SUBJECT: Licensee Event Report, Peach Bottom Atomic Power Station Unit 2

This LER reports a condition prohibited by Technical Specifications by entering Mode 2 without performing a required surveillance test. The LER is being submitted pursuant to the requirements of 10CFR50.73(a)(2)(i)(B).

Reference:	Docket No. 50 277
Report Number:	2-00-005
Revision Number:	00
Event Date:	10/04/00
Report Date:	11/03/00
Facility:	Peach Bottom Atomic Power Station Unit 2 1848 Lay Road, Delta, PA 17314-9032

Sincerely,

Paul J. Davison for

Gordon L. Johnston, Plant Manager

GLJ/scb

enclosure

cc: PSE&G, Financial Controls and Co-owner Affairs
R. R. Janati, Commonwealth of Pennsylvania
INPO Records Center
H. J. Miller, US NRC, Administrator, Region I
R. I. McLean, State of Maryland
A. C. McMurtray, US NRC, Senior Resident Inspector
A. F. Kirby III, DelMarVa Power

CCN 00-14083

IE22

NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION
(6-1998)

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

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TITLE (4)
This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B) for a condition prohibited by Technical Specifications due to entering Mode 2 without performing a required surveillance test.

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 Name	Docket Number
10	04	2000	2000	005	00	11	03	2000	Facility Name	Docket Number

OPERATING MODE (9)	2	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)						
POWER LEVEL (10)	0		20.2201(B)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)
			20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)
			20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71
			20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER
			20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 336A
			20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (include area code)
Andrew Winter	717.456.3598

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
A										
Personnel Error										

SUPPLEMENTAL REPORT EXPECTED (14)			EXPECTED Submission Date (15)	Month	Day	Year
YES (if yes, complete EXPECTED SUBMISSION DATE)	X	NO				

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

On October 4, 2000, it was discovered that a required post maintenance test (PMT) to scram time test control rod 34-55 was not performed prior to entering Mode 2 and commencing reactor startup. The test was required by Technical Specification SR 3.1.4.3 to verify control rod operability because maintenance was conducted on the control rod which could have affected its scram time. A plant startup was in progress and control rod 34-55 was moved to position 48 (full out) when a control room operator recognized that the appropriate PMT had not been performed. The reactor startup was immediately halted and the control rod was scram time tested satisfactorily.

Technical Specification SR 3.0.4 states "Entry into a mode or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met with their specified Frequency." Since the required surveillance was not performed in order to demonstrate the operability of control rod 34-55, entry into Mode 2 was prohibited by Technical Specifications.

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TEXT (If more space is required, use additional copies of NRC form 336A) (17)

Requirements of the Report

This LER is being submitted pursuant to the requirements of 10 CFR 50.73 (a)(2)(i)(B) due to a condition prohibited by Technical Specifications. Specifically, a reactor startup was commenced without a required surveillance test being completed to demonstrate the operability of one control rod (EIIS:AA). This constituted a violation of Technical Specification SR 3.0.4 which prohibits changing reactor modes without required surveillances being met.

Unit Conditions at Time of Event

Unit 2 was in Mode 2 (STARTUP) and subcritical (EIIS: EA) prior to the occurrence of the event. No other systems, structures, or components were inoperable which contributed to this event.

Description of the Event

Prior to Peach Bottom Atomic Power Station's thirteenth refueling outage, 2R13, a list was developed of Control Rod Drive Hydraulic Control Units (HCUs) which would require corrective or preventive maintenance during the outage. This list is procedurally controlled by GP-26 "Coordination of HCU, CRB, and CRD Work During a Refueling Outage." Control rod 34-55 (EIIS:AA) was not originally on this list because no maintenance was required on the HCU. However, during the outage, a condition occurred which required maintenance on control rod 34-55 scram valves. This maintenance could have impacted the control rod scram time. Subsequent to the maintenance, control rod 34-55 was added to the GP-26 list.

Procedure GP-26 requires a potential Technical Specification action (PTSA) log entry be made to document control rods which would not meet the operability requirements for Mode 2. For 2R13, there was one PTSA entry which included all control rods and HCUs which were worked during the outage. The PTSA log entry included a matrix documenting maintenance being performed and testing requirements for declaring a control rod operable. Control rod 34-55 was added to the matrix with the appropriate testing requirements as required by GP-26.

Also prior to 2R13, the HCU coordinator developed a list for documenting PMTs on control rods per ST-R-003-485, "CRD Scram Insertion Timing of Selected Control Rods." This list was based on the original list of control rods to be worked during the outage. When the unplanned maintenance occurred on control rod 34-55 HCU, the HCU coordinator did not update the original ST-R-003-485 PMT documentation as required nor was a new ST-R-003-485 initiated to address the emergent issue.

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Technical Specification Surveillance Requirement SR 3.1.4.3 requires verifying control rod scram time is within limits prior to declaring the control rod operable after work on the control rod or CRD system that could affect scram times. At Peach Bottom, this test is performed at 0 psig reactor pressure prior to startup.

On 09/30/00, scram time testing was conducted on the control rods documented on the ST-R-003-485 list originally generated by the HCU coordinator. Control rod 34-55 was not included on this list. The HCU coordinator informed the control room that testing was completed satisfactorily. After receiving word from the HCU coordinator that all control rods were tested satisfactorily, operation personnel updated the PTSA log matrix to indicate that the PMT for all control rods were completed, including control rod 34-55.

Based on the updated matrix, which reflected that all required testing was completed, the PTSA log entry was closed on 10/04/00, which indicated that all work orders associated with control rods were completed.

On 10/04/00 at 1818, Mode 2 was entered and a reactor startup was commenced. At 2321 on 10/04/00, it was discovered that the required PMT for control rod 34-55 had not been completed. At the time of discovery, control rod 34-55 had already been withdrawn to position 48 (full out) in accordance with the startup procedure.

The operating crew immediately halted power ascension and performed scram time testing on control rod 34-55. The scram time for control rod 34-55 was satisfactory and control rod 34-55 was declared operable. The crew also performed a line by line verification of the PTSA matrix to ensure that all control rods which had been worked during the outage received an appropriate PMT prior to startup. No other PMT discrepancies were noted.

Technical Specification SR 3.0.4 states "Entry into a mode or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met with their specified Frequency." The specified frequency for SR 3.1.4.3 is "Prior to declaring control rod OPERABLE after work on control rod or CRD System that could affect scram time." Since the required PMT was not performed in order to demonstrate the operability of control rod 34-55, entry into Mode 2 was prohibited by Technical Specifications.

This report is being submitted pursuant to 10CFR50.73(a)(2)(i)(B) which requires reporting any operation or condition prohibited by the plant's Technical Specifications.

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Cause of the Event

The causes of the event were the following human performance errors:

- Operations personnel closure of the PTSA was less than adequate because each control rod was not individually verified to be completed.
- The HCU coordinator did not update the ST-R-003-485 list of control rods to include control rod 34-55, which had emergent maintenance performed on it that could have affected its scram time.

Analysis of the Event

There were no safety consequences due to this event. Control rod 34-55 was withdrawn to position 48 in accordance with the startup procedure and within the approved banked position withdraw sequence. Subsequent scram time testing of control rod 34-55 indicated that the scram time was normal and the control rod would have performed its required safety function in the event a reactor scram was required.

Corrective Actions

The following corrective actions were completed:

- The startup was immediately halted and control rod 34-55 was scram time tested satisfactorily.
- A review of all other control rods which were worked during 2R13 was conducted to verify that all required PMT's had been performed. No other discrepancies were noted.

The following corrective actions are planned:

- Evaluate the current implementation of administrative controls by personnel for documenting control rod PMT completion to determine if they are adequate or could be improved.

Previous Events

No previous events could be identified where a reactor mode change occurred without performing required surveillances prior to changing modes.