

James A. FitzPatrick
Nuclear Power Plant
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Michael J. Colomb
Site Executive Officer

November 13, 2000
JAFP-00-0263

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Subject: **Docket No. 50-333**
LICENSEE EVENT REPORT: LER-00-014 (DER-00-04973)

**Failure to Meet Standby Gas Treatment System Technical Specifications
Required Action Statement Test Interval Requirement**

Dear Sir:

This report is submitted in accordance with 10 CFR 50.73(a) (2) (i) (B), "Any operation or condition prohibited by the plant's Technical Specifications."

There are no commitments contained in this report.

Questions concerning this report may be addressed to Mr. Gordon Brownell at (315) 349-6360.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Michael J. Colomb', written in a cursive style.

MICHAEL J. COLOMB

MJC:GB:las
Enclosure

cc: USNRC, Region 1
USNRC, Project Directorate
USNRC Resident Inspector
INPO Records Center

IE22

LICENSEE EVENT REPORT (LER)

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

Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If 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.

FACILITY NAME (1)
James A. FitzPatrick Nuclear Power Plant

DOCKET NUMBER (2)
05000333

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TITLE (4)
Failure to Meet Standby Gas Treatment System Technical Specifications Required Action Statement Test Interval Requirement

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	13	00	00	014	00	11	13	00	N/A	05000
									N/A	05000

OPERATING MODE (9)	N	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)	<input checked="" type="checkbox"/>	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			
		20.2203(a)(2)(iv)	50.36(c)(2)		50.73(a)(2)(vii)				

LICENSEE CONTACT FOR THIS LER (12)

NAME Mr. Gordon Brownell, Sr. Licensing Engineer	TELEPHONE NUMBER (include Area Code) 315-349-6360
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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		
YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO		MONTH	DAY	YEAR

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

On October 13, 2000, at 0905 hours, with reactor power at 0 percent and the mode switch in the REFUEL position, it was determined that Surveillance Test Procedure ST-7C, "One Circuit of Standby Gas Treatment System Inoperable Test" had not been performed within the interval required by the plant Technical Specifications (TS). Specifically, on October 12, 2000, at approximately 0130 hours, Standby Gas Treatment (SGT) System train B was removed from service. In preparation for its removal, operators satisfied the TS Required Action Statement for SGT System train A by successfully completing ST-7C at 0115 hours. TS 4.7.B.2 requires when one SGT System train becomes inoperable, the operable train shall be verified to be operable immediately and daily thereafter. ST-7C was not completed again until 0918 hours on 10/13/00. The TS required test interval requirement (including the allowable 25 percent extension) was exceeded by approximately 2 hours.

The cause of this event was personnel error. This non-routine surveillance test had not been added to or included in the operator's daily surveillance checks.

Corrective actions included counseling the individuals involved, completing a review of all routine STs and active Limiting Conditions for Operation (LCOs) to ensure there were no other overdue surveillance tests, and Operations Management reviewing this event with the operating shifts.

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		00	014	00	

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

EIIS Codes in []

Event Description

On October 13, 2000 at 0905 hours, with reactor power at 0 percent and the mode switch in the REFUEL position during Refuel Outage 14, it was determined that Surveillance Test Procedure ST-7C, "One Circuit of Standby Gas Treatment System Inoperable Test" had not been performed within the interval required by the plant Technical Specifications (TS).

On October 12, 2000, at approximately 0130 hours, Standby Gas Treatment (SGT) System [BH] train B was removed from service in anticipation of scheduled work on the 4kV power bus in the same safety division. In preparation for the removal of SGT train B from service, operators satisfied TS Required Action Statement for SGT train A by successfully completing Surveillance Test Procedure ST-7C at 0115 hours. TS 4.7.B.2 requires when one SGT System train becomes inoperable, the operable train shall be verified to be operable immediately and daily thereafter. ST-7C was not completed again on SGT System train A until 0918 hours on October 13, 2000, approximately 32 hours after the initial performance at 0115 hours on 10/12/2000. The TS required surveillance test interval (including the allowable 25 percent extension) for Surveillance Test Procedure ST-7C was exceeded by approximately 2 hours.

Cause of Event

The cause of this event was attributed to personnel error (Cause Code A). Non-routine surveillance tests are normally added to and included in the operator's daily surveillance checks. This practice was not performed following the initial completion of ST-7C.

A contributing cause to this event was the lack of a formal Administrative Control to ensure that non-routine surveillance tests are scheduled and performed on their TS required surveillance interval.

Analysis of the Event

This report is being submitted in accordance with 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications."

This event had minimal safety significance from an operational perspective. Successful completion of ST-7C on October 13, 2000 at 0918 hours demonstrated that SGT System train A was operable and capable of performing its intended safety function during the period SGT System train B was inoperable.

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Extent of Condition

A review of current Limiting Conditions for Operation (LCOs) involving non-routine surveillance test was completed. Results of this review determined that the conditions described in this report were limited to this specific surveillance test application and did not extend to other STs.

Corrective Actions

1. Immediate corrective action following discovery of the surveillance test scheduling error was to successfully complete ST-7C. (Completed)
2. A review of all active LCOs involving non-routine STs was conducted to ensure there were no other overdue surveillance test. (Completed)
3. Management expectations with regard to scheduling non-routine surveillance tests were discussed with the individuals involved. (Completed)
4. Operations Management reviewed the circumstances surrounding this Event with the operating shifts. (Completed)
5. An interim process has been established for tracking required periodic non-routine surveillance. This interim process will remain in place pending completion of a formal tracking method. (Scheduled Completion Date: December 31, 2000)
6. Operations Department will complete a review to identify other existing informal operational practices which may require the establishment of a formal administrative control. (Scheduled Completion Date: February 28, 2001)

Additional Information

Previous Similar Events:

1. LER 00-001 identified an instance where surveillance test requirements were not performed within the required time period. However, that event was not the result of a surveillance test scheduling error.
2. Failed Components: NONE
3. Applicability to NEI 99-02, Rev.0:

This event did not result in a Safety System Functional Failure.