



May 22, 2001

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Operating Licenses DPR-58 and DPR-74  
Docket Nos. 50-315 and 50-316

Document Control Manager:

In accordance with the criteria established by 10 CFR 50.73 entitled Licensee Event Report System, the following revised report is being submitted:

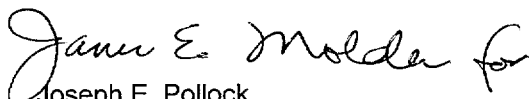
LER 316/2000-012-01, "Failure to Perform Increased Frequency Surveillance on 2 East Containment Spray Pump."

This LER supplement is being submitted to include information from the completed root cause evaluation. Vertical lines in the right margin identify revised or supplementary information.

No new commitments were identified in this submittal.

Should you have any questions regarding this correspondence, please contact Mr. Ronald W. Gaston, Manager Regulatory Affairs, at (616) 465-5901, extension 1366.

Sincerely,

  
Joseph E. Pollock  
Plant Manager

/jlm  
Attachment

c: J. E. Dyer, Region III  
L. Brandon  
B. A. McIntyre  
T. P. Noonan  
A. C. Bakken III  
R. P. Powers  
M. W. Rencheck  
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NRC Resident Inspector  
Records Center, INPO

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NRC Form 366 (6-1998)	U.S. NUCLEAR REGULATORY COMMISSION  <h2 style="margin: 0;">LICENSEE EVENT REPORT (LER)</h2> <p style="margin: 0;">(See reverse for required number of digits/characters for each block)</p>	APPROVED BY OMB NO. 3150-0104    EXPIRES 06/30/2001  <small>ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-8 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</small>
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TITLE (4)  
  
 Failure to Perform Increased Frequency Surveillance on 2 East Containment Spray Pump

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	
08	11	2000	2000	--	012	--	01	05	18	2001	

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)										
POWER LEVEL (10)	100	20.2201 (b)				20.2203(a)(2)(v)				<input checked="" type="checkbox"/>	50.73(a)(2)(i)	50.73(a)(2)(vii)
		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 366A
20.2203(a)(2)(iv)				50.36(c)(2)					50.73(a)(2)(vii)			

**LICENSEE CONTACT FOR THIS LER (12)**

NAME  J. L. Mathis, Regulatory Compliance	TELEPHONE NUMBER (Include Area Code)  616 / 465-5901, x1578
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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

<b>SUPPLEMENTAL REPORT EXPECTED (14)</b>					<b>EXPECTED SUBMISSION DATE (15)</b>			MONTH	DAY	YEAR
YES <small>(If Yes, complete EXPECTED SUBMISSION DATE).</small>	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>	<input type="checkbox"/>						

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

On August 11, 2000, it was determined that the required surveillance frequency for the Unit 2 East Containment Spray (CTS) pump had not been met. Vibration results in the Alert range from the previous performance of 2 East CTS pump surveillance in June 2000 required an increased surveillance frequency. The next surveillance should have been performed no later than July 20, 2000, but was not performed until August 11, 2000. This condition is a violation of Technical Specification (TS) 4.0.5, and was reportable in accordance with 10CFR50.73(a)(2)(i)(B), for a condition prohibited by TS. This supplement incorporates the root cause investigation results.

The root cause of the missed surveillance was attributed to programmatic deficiencies within the IST Program that allowed a single human error to cause a program failure. The programmatic deficiencies were: absence of a tracking system, inadequate prompt communication with interface organizations, and an informal process for distribution/review of test results. The IST program procedure, EHI-5071 "Inservice Testing Program Implementation," was revised to require that the IST Program Coordinator provide written notification to the Surveillance-Scheduling Group when an IST component enters the Alert range and the associated surveillance frequency must be increased. Procedural enhancements were made to Operations procedure OHI-4016, "Conduct of Operations Guidelines," and Plant Manager procedure PMP-4030-EXE-001 to provide additional barriers to prevent recurrence.

The failure to test on an increased frequency was evaluated for safety significance. It was determined that the event was of minimal safety significance, as the 2 East CTS pump was operable.

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

**Conditions Prior to Event**

Unit 2 was in Mode 1, Power Operations, at 100 percent Rated Thermal Power.

**Description of Event**

On August 11, 2000, the Unit 2 East Containment Spray (CTS) pump quarterly operability surveillance test was performed. The pump vibration test results fell in the Inservice Testing (IST) program Alert range. Post surveillance review of the previous test performed on June 4, 2000, revealed that the vibration results were also in the Alert range in June. Vibration results in the Alert range should have resulted in the operability surveillance being performed on an increased frequency, no later than July 20, 2000. The required testing was not performed until August 11, 2000.

Failure to perform the surveillance testing on an increased frequency is a violation of Technical Specification (TS) 4.0.5. LER 316/2000-012 was submitted in accordance with 10CFR50.73(a)(2)(i)(B), for a condition prohibited by TS. This supplement incorporates the root cause investigation results.

**Cause of Event**

The root cause of the missed surveillance was attributed to programmatic deficiencies within the IST program that allowed a single human error to cause a program failure. These programmatic deficiencies were: absence of a tracking system, inadequate prompt communication with interface organizations, and an informal process for distribution/review of test results. A contributing cause to the missed surveillance was human error in that the responsible individual failed to identify the pump vibration was in the alert range.

**Analysis of Event**

The CTS provides spray cooling water to the containment atmosphere in order to prevent containment pressure from exceeding its design value following a Loss of Coolant Accident (LOCA) or a rupture of a steam line inside containment. Additionally, CTS is designed to remove radioactive iodine isotopes from the containment atmosphere during a LOCA.

Testing of the CTS pumps under the IST program is required in accordance with TS 4.0.5, and performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code. Acceptance criteria for mechanical parameters such as vibration are established in accordance with ASME/ANSI OMa-1988, Part 6. The "Action Ranges" are defined by the acceptance criteria and indicate consequent courses of action to be taken based on test results. When testing is completed, the results are compared with the associated acceptance criteria values and the applicable range is determined. Test results falling into the "Acceptable" range indicate that the associated component is in a state of operational readiness, and testing of the component shall continue at the normal test frequency. Test results falling in the "Alert" range indicate that the associated component, though in a state of operational readiness, is exhibiting degraded performance. If the results fall in the Alert range, the frequency of test for the component shall be increased per ASME/ANSI OMa-1988, Part 6. If the test results fall in the "Required Action" range, the component will be declared inoperable and corrective action initiated immediately.

The failure to perform the surveillance test of the 2 East CTS pump at an increased interval did not meet the requirements for testing under TS 4.0.5. The August 11, 2000, surveillance results confirmed that the pump was operational, and had not undergone additional degradation since the previous surveillance in June 2000. Failure to perform the surveillance at an increased interval therefore had minimal safety significance.

**Corrective Actions**

An extent of condition review was performed to determine if any other equipment had results outside the acceptable range that had not been identified and tested on an increased frequency. It was determined that the 2 West CTS pump also had vibration results in the Alert range that had not been previously identified. The pump was tested on June 2, 2000, and the surveillance would have been due again no later than July 18, 2000. The test was performed on July 6, 2000 as part of the

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

schedule re-alignment after unit startup, which also satisfied the increased frequency requirement. The surveillance was performed again on August 25, 2000, with vibration results still in the Alert range.

In addition, the 2 AB Emergency Diesel Generator (EDG) AB-1 Jacket Water pump quarterly operability surveillance was performed on May 27, 2000, and the vibration results were in the Alert range. An increased frequency would have required retest no later than July 12, 2000. The test was not performed, however this did not result in the 2 AB EDG being inoperable, as the redundant Jacket Water pump, 2 AB-2, was operable during the entire period. The 2 AB-1 Jacket Water pump was tested on August 12, 2000. Test results remained in the Alert range for vibration.

The 2 East and West CTS pumps and the 2 AB EDG AB-1 Jacket Water pump have been placed on an increased frequency surveillance interval.

Operations guideline OHI-4016, "Conduct of Operations Guidelines," was revised to require Operations to initiate an Action Request in the Electronic Single Action Tracking (eSAT) system per the Corrective Action Program Process Flow procedure when IST surveillance results fall in the Alert range, and contact Engineering Programs. This revision will ensure that a CR is written promptly after completion of a surveillance.

The IST Program procedure, EHI-5071, "Inservice Testing Program Implementation," was revised to require that the IST Program Coordinator provide written notification to the Surveillance-Scheduling Group when an IST component enters the Alert range and the associated surveillance frequency must be increased.

Plant Manager Procedure PMP-4030.EXE.001, "Conduct of Surveillance Testing," was revised to require that the responsible Department Supervisor ensures that the surveillance test procedure data is promptly reviewed and that proper distribution of the test data package. In addition, If deficiencies or failures are observed during the performance of the surveillance procedures, initiation of an Action Request in accordance with the requirements of the Esat system was added to the procedure.

Disciplinary action was taken in accordance with plant policy for the IST Program Coordinator who failed to identify the need to increase the surveillance frequency for the mentioned pumps.

Training on procedures were provided to all staff conducting IST reviews.

**Previous Similar Events**

None