



Nuclear Management Company, LLC
Prairie Island Nuclear Generating Plant
1717 Wakonade Dr. East • Welch MN 55089

June 6, 2001

10 CFR Part 50
Section 50.73

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

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-306 License Nos. DPR-60

**LER 2-01-01: Failure to Meet Technical Specification Limiting Condition for
Operation Verification within Eight Hour Limit Due to Personnel Error**

The Licensee Event Report for this occurrence is attached. In the report, we made no new NRC commitments. Please contact us if you require additional information related to this event.

Joel P. Sorensen
Site Vice President
Prairie Island Nuclear Generating Plant

- c: Regional Administrator - Region III, NRC
- NRR Project Manager, NRC
- Senior Resident Inspector, NRC
- James Bernstein, State of Minnesota

Attachment

IE 22

NRC FORM 366 (1-2001)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 6-30-2001 Estimated burden per response to comply with this mandatory information collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bjs1@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose 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.
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)		

FACILITY NAME (1) Prairie Island Nuclear Generating Plant Unit 2	DOCKET NUMBER (2) 05000 306	PAGE (3) 1 OF 4
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TITLE (4)
 Failure to Meet Technical Specification Limiting Condition for Operation Verification within Eight Hour Limit Due to Personnel Error

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MO	DAY	YEAR	FACILITY NAME	DOCKET NUMBER	
04	10	01	01	- 01	- 00	06	06	01			
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply) (11)								
1			20.2201(b)	20.2203(a)(3)(ii)			50.73(a)(2)(ii)(B)		50.73(a)(2)(ix)(A)		
POWER LEVEL (10)			20.2201(d)	20.2203(a)(4)			50.73(a)(2)(iii)		50.73(a)(2)(x)		
100			20.2203(a)(1)	50.36(c)(1)(i)(A)			50.73(a)(2)(iv)(A)		73.71(a)(4)		
			20.2203(a)(2)(i)	50.36(c)(1)(ii)(A)			50.73(a)(2)(v)(A)		73.71(a)(5)		
			20.2203(a)(2)(ii)	50.36(c)(2)			50.73(a)(2)(v)(B)		OTHER		
			20.2203(a)(2)(iii)	50.46(a)(3)(ii)			50.73(a)(2)(v)(C)		Specify in Abstract below or in NRC Form 366A		
			20.2203(a)(2)(iv)	50.73(a)(2)(i)(A)			50.73(a)(2)(v)(D)				
			20.2203(a)(2)(v)	✓ 50.73(a)(2)(i)(B)			50.73(a)(2)(vii)				
			20.2203(a)(2)(vi)	50.73(a)(2)(i)(C)			50.73(a)(2)(viii)(A)				
			20.2203(a)(3)(i)	50.73(a)(2)(ii)(A)			50.73(a)(2)(viii)(B)				

LICENSEE CONTACT FOR THIS LER (12)

NAME Jack Leveille	TELEPHONE NUMBER (Include Area Code) 651-388-1121
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	
SUPPLEMENTAL REPORT EXPECTED (14)										
YES (If yes, complete EXPECTED SUBMISSION DATE).					<input checked="" type="checkbox"/>	NO				
					<input type="checkbox"/>					

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

On April 9, 2001, testing of the Unit 2 emergency diesel generator D6 was being performed. At 0845, surveillance procedure SP2307, "D6 Diesel Generator 6 Month Fast Start Test" was begun as part of the requirement to complete surveillance procedure SP2335, "D6 DG 18 Month 24 Hour Load Test". At 0930, at the normal step in SP2307, D6 was removed from service and Technical Specification 3.7.B.1 was entered. Technical Specification (TS) 3.7.B.1. Limiting Condition for Operation (LCO) requires, in the event of the inoperability of one of the unit's two emergency diesel generators: "One diesel generator may be inoperable for 7 days provided . . . (d) the OPERABILITY of the two required paths from the grid shall be verified OPERABLE within 1 hour and at least once per 8 hours thereafter." For item (d), the OPERABILITY of the two required paths from the grid was verified at approximately 0855 and 1505 via SP2118, "Verifying Paths from the Grid to Unit 2 Busses." However, at 0130 on April 10, 2001, it was discovered that the eight hour limit for the next verification had been exceeded. Eleven minutes later, at 0141, SP2118 was completed satisfactorily and within the eight hour limit thereafter until D6 was returned to service on April 17, 2001.

Several corrective actions to improve the surveillance procedures involved in grid verification, to improve clock management, and to improve shift turnover communications have been initiated to address issues determined to have contributed to this event.

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

EVENT DESCRIPTION

On April 9, 2001, testing of the Unit 2 emergency diesel generator¹ D6 was being performed. At 0845, surveillance procedure SP2307, "D6 Diesel Generator 6 Month Fast Start Test" was begun as part of the requirement to complete surveillance procedure SP2335, "D6 DG 18 Month 24 Hour Load Test". At 0930, at the normal step in SP2307, D6 was removed from service just prior to taking manual control. Concurrently, Technical Specification 3.7.B was entered placing D6 in a 7-day Limiting Condition for Operation (LCO) action statement.

At 1045, the 24-hour load test was begun. At 1330, D6 was unloaded and stopped, and remained out of service until April 17, 2001. Technical Specification (TS) 3.7.B.1. LCO requires, in the event of the inoperability of one of the unit's two emergency diesel generators:

"One diesel generator may be inoperable for 7 days provided (a) the OPERABILITY of the other diesel generator is demonstrated* by performance of surveillance requirement 4.6.A.1.e within 24 hours**, (b) all engineered safety features equipment associated with the operable diesel generator is OPERABLE, (c) the two required paths from the grid to the unit 4 kV safeguards distribution system are OPERABLE and (d) the OPERABILITY of the two required paths from the grid shall be verified OPERABLE within 1 hour and at least once per 8 hours thereafter."

Items (a), (b), and (c) were met as specified. For item (d), the OPERABILITY of the two required paths from the grid was verified prior to removal of D6 from service. at approximately 0855 on April 9, 2001, via SP2118, "Verifying Paths from the Grid to Unit 2 Busses," the designated method of meeting this TS requirement. SP2118 was repeated at 1505 on April 9, 2001. However, at 0130 on April 10, 2001, it was discovered that the eight hour limit for the next verification had been exceeded. Eleven minutes later, at 0141, SP2118 was completed satisfactorily and the eight hour limit was met thereafter until D6 was returned to service the night of April 17, 2001.

CAUSE OF THE EVENT

The event was evaluated by a root cause team which concluded that the root cause was an inadequate shift turnover. There were several performance error prevention barriers broken which allowed this event to occur:

1. Turnover logs were not utilized to inform the oncoming crew of the next time to perform SP2118.
2. Shift briefing did not cover LCO Action Statements that were in effect, as recommended by Operations Department work instruction SWI-O-2, "Shift Organization, Operation and Turnover," Paragraph 6.4.1.f.2.
3. A mechanical timer was set to alarm but NOT started by the day shift.

¹ EIS Component ID: DG

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

- Procedures SP2307, "D6 Diesel Generator 6 Month Fast Start Test" and SP2335, "D6 DG 18 Month 24 Hour Load Test" had no sign-off to indicate that SP2118 has been performed every 8 hrs during the LCO.
- The day shift operator with responsibility for performing SP2118 had the function of designated diesel operator. However, since the diesel testing had been completed for the time being, there was no oncoming operator to whom to provide a turnover, as no diesel generators were running at turnover time.

This event is unique in that it is the first time this surveillance has been missed where required by an LCO. However, several barriers were broken which could lead to similar events in the future if not corrected. Therefore, actions to prevent recurrence are warranted.

ANALYSIS OF THE EVENT

Since this event consisted of a condition prohibited by the plant's TS, it is reportable per 10CFR 50.73(a)(2)(i)(B). Per the reasons discussed below in the "Significance Determination," health and safety of the public was not affected.

Loss Of Safety Function and Other Performance Indicator Impact

There was no loss of safety function because the other Unit 2 emergency diesel generator was available during this event. None of the other performance indicators will be affected by this event.

Significance Determination

Review of the plant emergency response computer and control board annunciators has confirmed that the two required paths to the grid were operable during the entire time from 1505 on April 9, 2001 until 0141 on April 10, 2001. Therefore this event had no safety significance, since the function required to be verified was indeed available throughout the period.

CORRECTIVE ACTION

Prairie Island is making the following enhancements to prevent recurrence of this event or occurrence of similar events:

- Remind operators of the importance of passing information to their reliefs via the turnover log. (Action 20014133)
- Create a time tracking form and revise SP1118/2118 to include a step to initiate the use of the new form to track performance of the verification of two paths from the grid. (Action 20014134)
- Use consistent wording among surveillance procedures that address grid verification requirements and the use of the new form to track when SP1118/2118 are due. (Action 20014135)

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

4. Revise the turnover log for shift managers, shift supervisors, and control room operators to include space to log TS action requirements in effect. (Action 20014136)
5. Change the procedural time requirement for grid verification to every 6 hours to provide some margin for the TS limit of 8 hours. (Action 20014138)
6. Revise the Operations Department instruction SWI O-2 to specify the responsibilities of "non-duty" operators for informing the "duty" operator of activities to be performed. (Action 20014139)
7. Evaluate possible computer aided methods for alerting operators to requirements for time scheduled actions. (Action 20014141)

FAILED COMPONENT IDENTIFICATION

None.

PREVIOUS SIMILAR EVENTS

No licensee event reports have been made in the last six years for a missed (or late) LCO-required surveillance.