From: "Golub, Pareez E." <pareez.golub@exeloncorp.com>
To: "'Christopher Gratton'" <CXG1@nrc.gov>
Date: 3/13/02 9:34AM
Subject: RE: admin error in TS

Chris-
Sorry about that! I have included the text of the message in this email) you just won't have my fabulous formatting :)):

1R09 Rod Block Monitor Surveillance Requirement

Issue:
LGS did not perform the surveillance test for the Rod Block Monitor (RBM) - Upscale within the frequency (semi-annually) designated in the LGS U2 TS Table 4.3.6-1, "Control Rod Block Instrumentation Surveillance Requirements."

Conclusion:
The SR is not considered missed since the NRC-approved frequency for the SR was every refueling outage, not semi-annual. There was an administrative error that occurred in the mid-'90s when two independent changes to the same TS page were submitted to the NRC and not properly reconciled after NRC approval.

Required Actions:
- CR generated to disposition and track corrective actions
- Contact NRC to correct the administrative error in the TS

Comparison with LGS Unit 1 TS Table 4.3.6-1:

Limerick Unit 1 changed the frequency of that surveillance requirement from semi-annual ("SA") to every refueling outage ("R") with license Amendment No. 66, dated February 10, 1994, which approved ARTS/MELLLA for U1.

History of Amendments for LGS Unit 2 TS Table 4.3.6-1:

- License Amendment Request (LAR), dated February 27, 1993, was sent to NRC asking for approval of ARTS/MELLLA for both Units 1/2 with staggered implementation. Unit 1 requested implementation in February 1994, while Unit 2 requested implementation in March 1995. As part of this LAR, the frequency of RBM-Upscale was changed from semi-annual to every refueling outage.
- LAR dated August 22, 1994, was sent to the NRC and also requested changes to U1/U2 Table 4.3.6-1 to delete the requirement to perform the RBM Functional Test prior to startup. The changes to the U1 table were marked-up on the then-current U1 TS pages, which reflected the frequency change to every refueling outage. The changes to the U2 table were marked-up on the then-current U2 TS pages, which did not reflect the SR frequency change (since ARTS/MELLLA had not been approved for U2).

From the 8/22/94 submittal:
"The Unit 1 TS page reflects the ARTS/MELLLA changes which have already been implemented at LGS Unit 1 during 1R05. These changes are scheduled to be implemented at LGS Unit 2 during 2R03. Our Unit 2 TS amendment request to address these changes has not been issued by the NRC yet; therefore, the Unit 2 TS page looks different."

· Amendment No. 48 was issued on January 27, 1995 and changed the frequency of the RBM-Upscale from semi-annual to every refueling outage in accordance with ARTS/MELLLA being approved for LGS U2. The TS pages were updated appropriately.

· Amendment No. 63 was issued on July 18, 1995 and deleted the requirement to perform the RBM Functional Test prior to startup. When the TS pages associated with this change were placed in the TS book, they did not take into account the previous amendment for ARTS/MELLLA. This caused an administrative error in that U2 TS Table 4.3.6-1 reflected the SR frequency of semi-annual ("SA") instead of every refueling outage ("R"). · LAR for Power Range Neutron Monitoring, dated October 14, 1999 was sent to the NRC. The mark-up for Table 4.3.6-1 continued to reflect the incorrect SR frequency of semi-annual.

· Amendment 109 from the NRC approved the changes for PRNM and re-issued the table with the incorrect SR frequency.

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