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Monticello Nuclear Generating Plant
Operated by Nuclear Management Company, LLC

December 19, 2002

10 CFR Part 50
Section 50.73

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

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

LER 2002-007
Application of Instrumentation Deviation Acceptance Criteria Allowed As-Found Settings For High Drywell Pressure to be Outside Technical Specification Value

A Licensee Event Report for this occurrence is attached. This report contains no new NRC commitments.

Contact Paul Hartmann at (763) 271-5172 if you require further information.

Jeffrey S. Forbes
Site Vice President
Monticello Nuclear Generating Plant

Enclosure

c: Regional Administrator - III NRC
NRR Project Manager, NRC
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JE22

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NRC FORM 366 (7-2001) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104 EXPIRES 7-31-2004

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)

1. FACILITY NAME	2. DOCKET NUMBER	3. PAGE
Monticello Nuclear Generating Plant	05000263	1 OF 5

4. TITLE

Application of Instrumentation Deviation Acceptance Criteria Allowed As-Found Settings For High Drywell Pressure to be Outside Technical Specification Value

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MO	DAY	YEAR	FACILITY NAME	DOCKET NUMBER 05000
10	21	02	2002	– 007	– 00	12	19	2002	FACILITY NAME	DOCKET NUMBER 05000

9. OPERATING MODE	N
10. POWER LEVEL	100

11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)

	20.2201(b)		20.2203(a)(3)(ii)		50.73(a)(2)(ii)(B)		50.73(a)(2)(ix)(A)
	20.2201(d)		20.2203(a)(4)		50.73(a)(2)(iii)		50.73(a)(2)(x)
	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 Specify in Abstract below or in NRC Form 366A
	20.2203(a)(2)(iii)		50.46(a)(3)(ii)		50.73(a)(2)(v)(C)		
	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)	X	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)		

12. LICENSEE CONTACT FOR THIS LER

NAME	TELEPHONE NUMBER (Include Area Code)
Paul Hartmann	763-271-5172

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX		CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED				15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
	YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO				

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

During the quarterly surveillance 0003, Drywell High Pressure Scram and Group 2, 3, and Secondary Containment Isolation Test and Calibration Procedure, it was discovered that the as-found value for the B and C channels exceeded the Technical Specification (TS) limit for High Drywell Pressure. The instrumentation was able to fulfill its safety function. The channels were adjusted and verified to have as-left limits within TSs. The common cause or condition for both instrument channels is that the calibration procedure used the allowable deviation in the TS Bases to allow the as-found condition to exceed a TS trip setting.

LICENSEE EVENT REPORT (LER)

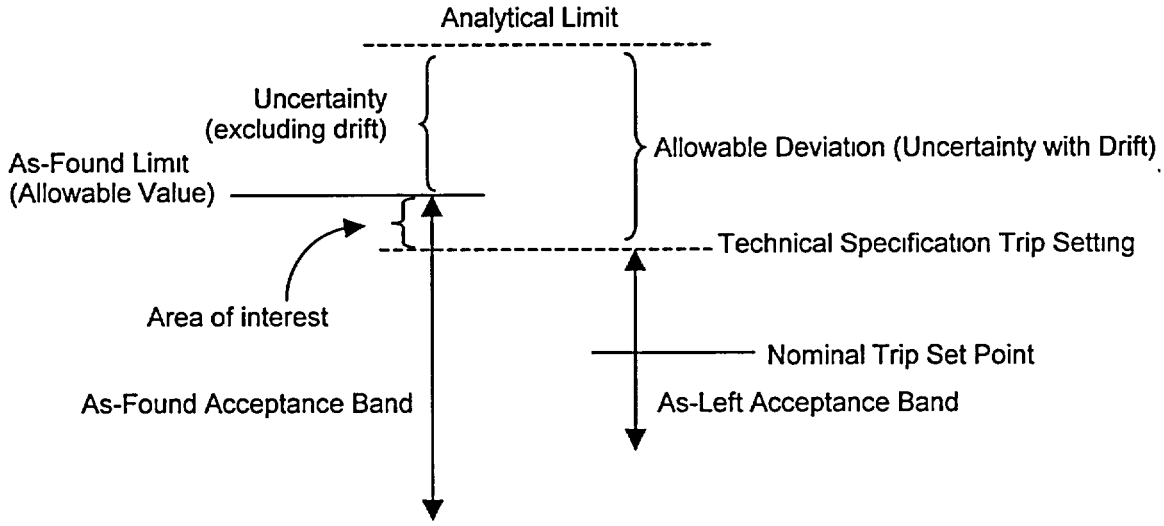
FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Monticello Nuclear Generating Plant	05000263	2002	– 007	– 00	2 OF 5

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

Description

On October 21, 2002, while at 100% power, during the performance of quarterly surveillance 0003, Drywell [1]High Pressure Scram and Group 2, 3, and Secondary Containment Isolation Test and Calibration Procedure, it was noted that two of the four drywell pressure instrument channel [2](B and C) high drywell pressure as-found trip setpoint values were greater than Technical Specification (TS) limits, but within the As-Found Limit (Allowable Value) of 81 inches Water Column (WC) specified in the surveillance (see area of interest below). The High Drywell Pressure TS Trip setting is required to be less than or equal to 2 psig (55.4 inches WC) for reactor protection, primary and secondary containment isolation functions. The B and C channels (PS-5-12B and C) were determined to have as-found trip setpoints of 56.0 inches WC (2.024 psig). The A and D channel as-found values were within TS limits.

The As-Found Acceptance Band criteria is based on an allowable deviation from the TS trip setting which takes into account drift and uncertainty to assure that analytical limits of the safety analyses are not exceeded. However, the allowable deviations are contained in tables in the Bases of the TS and should not be construed as an allowance to deviate from the TS. The application of the Allowable Deviations (from the Bases) to the Trip Settings (in the TS) is illustrated below.



For all four channels evaluated during the surveillance, the as-found value was within the Allowable Value, and as-left settings were adjusted if necessary and verified to be within the TS trip setting. Since the as-found condition was within the Allowable Value, the safety function of each channel was not affected since the analytical limit could not have been exceeded. Therefore, while the as-found condition did not meet TS requirements, the safety function of the instruments was not affected.

[1] EIIS System Code-VB
[2] EIIS Component Code-PS

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Monticello Nuclear Generating Plant	05000263	2002	– 007	– 00	3 OF 5

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

Event Analysis

Analysis of Reportability

This report is being submitted in accordance with 10 CFR 50.73(a)(2)(vii) since a single cause or condition caused multiple channels of a system designed to shutdown the reactor, remove residual heat, control the release of radioactive material, or mitigate the consequences of an accident became inoperable.

The "cause or condition" is that the calibration procedure used the allowable deviation in the TS Bases to allow the as-found condition to exceed a TS trip setting.

Each channel is calibrated separately and is returned to the nominal trip setpoint prior to calibrating the next channel. Thus, no two channels are allowed to remain outside the TS trip setting at the same time. However, for the purposes of 50.73(a)(2)(vii), both channels could probably be assumed to be outside the TS trip setting (i.e., inoperable) at the same time, since the channels are calibrated back to back.

This event does not constitute a safety system functional failure because all channels would have been able to perform their safety function.

Safety Significance

This condition is not considered safety significant. While the as-found condition was outside the TS setting value, the instruments would have functioned within analytical limits in order to perform their safety function.

It was recognized that instrument setpoint drift, inherent instrument error, operator setting error, etc. cause deviations that could move instrument settings beyond TS setpoint. These deviations were accounted for in transient analyses. Instrument setpoint calculations and surveillance procedures were written based upon preventing instrument settings from exceeding analytical limits. Acceptance criteria ensure that an analytical limit is not exceeded. The deviation tables were provided and described in the Bases section to clearly show that analytical limits would not be exceeded due to these effects.

All instrument as-left values were within the TS value specified in the main body of the TS. Although the instrument as-found values could exceed the TS values, they were not caused by a "knowingly set" condition. When accounting for the various uncertainties, the as-found criteria assures that the TS setting, as modified by deviation, is not exceeded. Therefore, the analytical limit is preserved and all potentially affected systems and components are operable and can fulfill their safety function.

This condition has been evaluated by the Monticello Plant Probability Risk Assessment (PRA) Group. The evaluation determined there was no significant impact on the values for core damage frequency or large early release frequency.

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Monticello Nuclear Generating Plant	05000263	2002	– 007	– 00	4 OF 5

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

Per revised surveillance procedure, an as-found value that exceeds the TS limit setting requires a condition report be generated in the Corrective Action Program (CAP). The process includes an operability evaluation of the involved systems, structures and components, cause determination and assessment.

Cause

While the deviation tables were included in the originally issued TS Bases, the TS Bases are not to be used to further qualify a TS requirement. The cause of the condition is the failure to consider incorporating the deviation table information into the TS tables.

Corrective Action

As discussed in LER 2002-002 (Previous Similar Event below), a review is being performed to determine whether changes to the TS instrument tables are required to incorporate Bases deviation table information into the TS.

The Site recognizes that due to the long-term nature of the corrective actions and the continuous and frequent performance of surveillances on equipment associated with the involved TS Instrumentation Tables, the potential exists for further reportable events. The Site also recognizes that future occurrences do not adversely affect the safety function of plant equipment. Interim actions are being taken to minimize the opportunity for future occurrences prior to the completion of long-term corrective actions. In cases where TS limits are exceeded, the CAP is utilized to evaluate each occurrence. Interim corrective actions presently include:

- Revising Procedure 0003 to include a note to adjust as-left trip settings before approaching as-left setpoint limits
- Recalibration of drywell high pressure switches to tighter as-left trip settings
- Identify and revise other surveillance procedures regarding as-left adjustment

Failed Component Identification

None

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Monticello Nuclear Generating Plant	05000263	2002	– 007	– 00	5 OF 5

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

Previous Similar Event

LER 2002-002, Application of Instrument Deviation Acceptance Criteria Allowed As-Found Settings to be Outside Technical Specification Value, was submitted for events where as-found setpoints exceeded the TS limit during a given calibration period. The cause of the event was calibration procedures used the allowable deviation in the TS Bases to allow the as-found condition to exceed a TS trip setting. The condenser low vacuum scram instruments were found to have exceeded TS trip settings. The instrumentation was able to fulfill its safety function.