

**ENERGY
NORTHWEST**

P.O. Box 968 ■ Richland, Washington 99352-0968

August 7, 2003
GO2-03-121

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397;
LICENSEE EVENT REPORT 2003-004-00**

Dear Sir or Madam:

Transmitted herewith is Licensee Event Report No. 2003-004-00 for Columbia Generating Station. This report is submitted pursuant to 10 CFR § 50.73(a)(2)(i)(B). The report discusses items of reportability and corrective actions taken.

If you have any questions or desire additional information regarding this matter, please contact Ms. CL Perino at (509) 377-2075.

Respectfully,



RL Webring
Vice President, Nuclear Generation
Mail Drop PE04

Enclosure: Licensee Event Report 2003-004-00

cc: TP Gwynn - NRC - RIV
BJ Benney - NRC - NRR
INPO Records Center
NRC Sr. Resident Inspector - 988C (2)
RN Sherman - BPA/1399
TC Poindexter - Winston & Strawn
WB Jones - NRC RIV/fax

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 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 bis1@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.

FACILITY NAME (1) Columbia Generating Station	DOCKET NUMBER (2) 05000397	PAGE (3) 1 OF 3
---	--------------------------------------	---------------------------

TITLE (4)
Condition Prohibited by Technical Specifications Limiting Condition for Operation 3.10.4

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
06	08	2003	2003	004	00	08	07	2003	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	4	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply) (11)											
POWER LEVEL (10)	000	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	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)	X	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 Fred A. Schill	TELEPHONE NUMBER (Include Area Code) (509) 377-2269

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

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

On June 8, 2003, with the reactor shutdown in mode 4 and the mode switch in the refuel position, a condition prohibited by the Columbia Generating Station Technical Specifications existed. Specifically, Function 7.a of Table 3.3.1.1-1 was not operable as required by special operations Limiting Condition for Operation (LCO) 3.10.4.c.1. Function 7.a of Table 3.3.1.1-1 is the transmitter/trip unit instrumentation [LT] that initiates a Reactor Protection System (RPS) trip on high Scram Discharge Volume (SDV) water level. This requirement of LCO 3.10.4 was not met because the transmitter/trip unit instrumentation on both SDVs was isolated in support of an SDV flushing procedure that was not in progress at the time. Special operations LCO 3.10.4 permits withdrawal of a single control rod for testing or maintenance and may be applied when the reactor is in cold shutdown. This LCO allows placing the reactor mode switch in the refuel position to enable the single control rod withdrawal permissive in order to perform control rod scram timing pursuant to Technical Specifications Surveillance Requirement 3.1.4.1 prior to reactor startup. The cause of the condition prohibited by Technical Specifications is attributed to human performance errors. No safety consequences were associated with the condition and redundant SDV float switches [LS] (Function 7.b) were operable to provide the RPS trip on high SDV level as required by LCO 3.10.4. This condition existed for approximately 5.5 hours during which time testing was performed on four control rods.

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
Columbia Generating Station	05000397	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
		2003-004-00			

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

Event Description

On June 3, 2003, with the reactor shutdown in mode 4 and the mode switch in the refuel position, a condition prohibited by the Columbia Generating Station Technical Specifications existed. Specifically, Function 7.a of Table 3.3.1.1-1 was not operable as required by special operations Limiting Condition for Operation (LCO) 3.10.4.c.1. Function 7.a of Table 3.3.1.1-1 is the transmitter/trip unit instrumentation [LT] that initiates a Reactor Protection System (RPS) trip on high Scram Discharge Volume (SDV) water level. This requirement of LCO 3.10.4 was not met because the transmitter/trip unit instrumentation on both SDVs was isolated in support of an SDV flushing procedure that was not in progress at the time. Special operations LCO 3.10.4 permits withdrawal of a single control rod for testing or maintenance and may be applied when the reactor is in cold shutdown. This LCO allows placing the reactor mode switch in the refuel position to enable the single control rod withdrawal permissive in order to perform control rod scram timing pursuant to Technical Specifications Surveillance Requirement 3.1.4.1 prior to reactor startup.

Immediate Corrective Action

Upon discovery that all requirements of LCO 3.10.4 were not met, plant operators exited the condition of applicability for LCO 3.10.4. All control rods were inserted into the reactor core and the mode switch was placed in the shutdown position preventing control rod withdrawal. Additionally, the SDV water level transmitter/trip unit instrumentation was restored to service and a night order documenting this event and lessons learned was transmitted to all operating crews.

Root Cause

The cause of the condition prohibited by Technical Specifications is attributed to human performance errors. These errors occurred during preparation of the procedure used for the SDV flushing activity and in assessing the impact of the flushing activity upon compliance with LCO 3.10.4.

Further Corrective Action

This event will be reviewed with all operations personnel and pre-job planners to convey the importance of thorough pre-job review of the scope of maintenance activities and assessment of Technical Specifications requirements when maintenance activities are performed.

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
Columbia Generating Station	05000397	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 3
		2003-004-00			

Assessment of Safety Consequences

No safety consequences were associated with the condition prohibited by Technical Specifications and plant operators would have been alerted to increasing water level in the SDVs. As the water level in the SDV increases, a control room alarm is actuated followed by control rod withdraw block and a reactor scram. These functions would have been initiated by redundant SDV float switches [LS] (Function 7.b of Table 3.3.1.1-1) that were operable to provide the RPS trip on high SDV level as required by LCO 3.10.4. The condition prohibited by Technical Specifications existed for approximately 5.5 hours during which time testing was performed on four control rods. The SDV is sized to receive and contain all of the water discharged by 185 control rod drives during a reactor scram. Because scram testing was performed on only four control rods, considerable margin existed to the water level at which alarms or automatic safety functions are initiated.

Similar Events

On May 2, 2001, Licensee Event Report 2001-002 reported a condition prohibited by Technical Specification LCO 3.3.1.1 existed due to a human performance error. This occurred when an SDV float switch instrument channel was not returned to service after performance of a 92-day Channel Functional Test.