FPL Energy
Seabrook Station

FPL Energy Seabrook Station
P.O. Box 300
Seabrook, NH 03874
(603) 773-7000

AUG 18 2003

Docket No. 50-443
NYN-03063

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Seabrook Station
Licensee Event Report (LER) 2003-001-00 for
Non-Compliance With Requirements of Technical Specification 3.8.1.1 Action b.

Enclosed is Licensee Event Report (LER) 2003-001-00. This LER reports an event that occurred at Seabrook Station on June 10, 2003. This event is being reported pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B).

Should you require further information regarding this matter, please contact Mr. James M. Peschel, Regulatory Programs Manager (603) 773-7194.

Very truly yours,

FPL ENERGY SEABROOK, LLC

Mark E. Warner
Site Vice President

cc: H. J. Miller, NRC Region I Administrator
V. Nerses, NRC Project Manager, Project Directorate I-2
G. T. Dentel, NRC Senior Resident Inspector

IE22

ENCLOSURE TO NYN-03063

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
Seabrook Station	0500 - 0443	1 OF 3

4. TITLE

Non-Compliance with Requirements of Technical Specification 3.8.1.1 Action b

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
06	10	2003	2003	- 001	- 00	08	15	2003	N/A	N/A
									FACILITY NAME N/A	DOCKET NUMBER N/A

9. OPERATING MODE	1
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) 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)	

12. LICENSEE CONTACT FOR THIS LER

NAME	TELEPHONE NUMBER (Include Area Code)
James M. Peschel, Regulatory Programs Manager	(603) 773-7194

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
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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

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

On June 10, 2003, due to a potential for a common mode failure found during preventive maintenance activities for the "A" Emergency Diesel Generator (EDG-1A), EDG-1B was started and run unloaded to satisfy the requirements of Technical Specification (TS) 3.8.1.1 action b.

A subsequent review conducted on June 18, 2003, determined that unloaded testing of EDG-1B did not adequately address the requirements of TS 3.8.1.1. EDG-1B was subsequently retested satisfactorily under loaded conditions. Failure to complete the loaded run within the required action statement time constitutes noncompliance with the requirements of the action statement and is reportable as a condition prohibited by TS pursuant to 10 CFR 50.73(a)(2)(i)(B). LER 02-002-00 identified a condition where plant operators failed to start the operable EDG unit within 24 hours after discovery as required by TS 3.8.1.1 action b.

The cause of this event was the failure of Licensee personnel to recognize the entire affect of a change to the Technical Specifications. Contributing causes include inadequate license amendment review process and an inadequate response to TS 3.8.1.1 questions. Corrective actions include enhancing the TS change review process, and providing additional training for the Operations Department and personnel involved in the event.

There were no adverse safety consequences as a result of this event.

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

I. Description of Event

At approximately 0500 hours on June 10, 2003, with the plant operating in MODE 1 at 100% power, the "A" Emergency Diesel Generator (EDG) - 1A [EK] was declared inoperable in order to perform preventive maintenance. During the preventive maintenance, broken Belleville washers were discovered on cylinder head #3 [ENG]. Due to a potential for a common mode failure, EDG-1B [EK] was started and run unloaded at 1701 on June 10, 2003 to meet the requirements of Technical Specification (TS) 3.8.1.1, action b.

A subsequent management review on June 18, 2003 (discovery date) determined that the unloaded testing of EDG-1B did not adequately address the footnote (***) for Surveillance Requirement (SR) 4.8.1.1.2a.5 and therefore did not meet the requirements of TS 3.8.1.1, action b. As a result of not completing surveillance requirement 4.8.1.1.2a.5, TS 4.0.3 was entered at 1700 on June 18, 2003.

The first sentence of the footnote (***) for SR 4.8.1.1.2a.5 was added to License Amendment request (LAR) 01-01 as a result of a comment received during the review of the LAR. The intention of adding the sentence to the footnote was to provide additional clarification to plant operators when performing the monthly surveillance testing of the EDG units. However, the addition of the first sentence unintentionally linked the requirement to perform a loaded test of the operable EDG unit in accordance with SR 4.8.1.1.2a.6 to TS 3.8.1.1, actions b and c. Incorporation of the reviewer's comment resulted in an unintended material change to the footnote. This change in intent was also not recognized by other licensee personnel, and the Station Operating Review Committee (SORC) and Nuclear Safety Audit Review Committee (NSARC) review committees prior to submittal and subsequent approval by the NRC.

In response to a February 14, 2002 question regarding SR 4.8.1.1.2a.5, Regulatory Compliance concluded that a loaded test of the diesel was not required when TS 3.8.1.1, action b or c are entered. Multiple opportunities to address the incorrect conclusion were missed prior to the event that resulted in the non-compliance with the TS action statement requirements.

Failure to complete surveillance requirements 4.8.1.1.2a.5 and 6 within the required action time, defined by TS 3.8.1.1, action b, constitutes a noncompliance with the requirements of TS 3.8.1.1. EDG-1B was subsequently satisfactorily retested under loaded conditions June 19, 2003 at 0325. The duration of the noncompliance from the time of discovery (1700, June 18, 2003) until TS 3.8.1.1 action b was satisfied (0325, June 19) was 10 hours, 25 minutes. This event represents a condition prohibited by the Technical Specifications and is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B).

II. Cause of Event

The cause of this event (personnel error) was a failure by Licensee personnel (non-licensed) to recognize the entire affect of a change to the wording proposed in SR 4.8.1.1.2a.5, footnote (***), originally proposed in LAR 01-01. This personnel error was made due to time pressure while developing the LAR. The LAR was primarily initiated to support corrective actions associated with the December 2000 failure of an EDG. The changes to the footnote were a very small part of a larger change to Technical Specifications.

A contributing cause (management deficiency) of this event was an inadequate LAR review process. The LAR review process had insufficient barriers, which allowed an isolated personnel error to go undetected.

An additional contributing cause (management deficiency) of this event was an inadequate evaluation and response to questions on TS 3.8.1.1 by Regulatory Compliance Department personnel. There were three occasions where questions were asked regarding the need to load the engine. In each instance, the Regulatory Compliance Department personnel relied upon the initial evaluation that stated the (***) only applied to the monthly surveillance.

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

III. Analysis of Event

There were no adverse safety consequences as a result of this event. Subsequent testing of EDG-1B on June 19, 2003 indicated that a common mode failure did not exist. EDG-1B remained operable and was capable of performing its intended safety function. This event is significant because plant operators did not correctly perform the actions required by TS 3.8.1.1, action b to run EDG-1B in a loaded condition.

As described in Seabrook Station – NRC Integrated Inspection Report 05000443/200303 issued on July 29, 2003, the finding associated with this event was determined to be of very low safety significance.

IV. Corrective Actions

Root Cause

An additional interdisciplinary review will be added to the LAR review process to address material changes that are made to the wording of a Technical Specification during the SORC, CNRB, and NRC review.

Contributing Causes

- Regulatory Compliance Department personnel will be briefed on the event and the lessons learned.
- Operations Department shift crews will be briefed by Regulatory Compliance supervision to address the lessons learned from this event.

Extent of Condition

- A review of license submittals since LAR 01-01 will be performed to ensure that review comments did not materially change the intent of the Technical Specifications.

V. Additional Information

None

VI. Similar Events

LER 02-002-00 was issued by Seabrook Station on September 27, 2002. This LER identified a condition where one EDG unit was declared inoperable due to kVAR fluctuations. As a result of this event, plant operators failed to start the operable EDG unit as required by TS 3.8.1.1, action b within 24 hours after discovery. The cause of the event was the lack of formal training given to plant operators regarding the requirements of TS 3.8.1.1, action b.