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Ref: 10CFR50.73(a)(2)(i)(B)

CPSES-200400552
Log # TXX-04024

March 12, 2004

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-446
CONDITION PROHIBITED BY TECHNICAL SPECIFICATIONS
LICENSEE EVENT REPORT 446/04-001-00

Gentlemen:

Enclosed is Licensee Event Report (LER) 04-001-00 for Comanche Peak Steam Electric Station Unit 2, "Refueling Water Storage Tank Level Channel Inoperable."

This communication contains no new licensing basis commitments regarding CPSES Units 1 and 2.

JE22

A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

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Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC,
Its General Partner

Mike Blevins

By: 

Mitch L. Lucas
Director of Nuclear Engineering

GLM/gm

Enclosure

c - B. S. Mallett, Region IV
W. D. Johnson, Region IV
M. C. Thadani, NRR
Resident Inspectors, CPSES

NRC FORM 366 (7-2001)			U.S. NUCLEAR REGULATORY COMMISSION			APPROVED BY OMB NO. 3150-0104 EXPIRES 07/31/2004 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)											
Facility Name (1) COMANCHE PEAK STEAM ELECTRIC STATION UNIT 2				Docket Number (2) 05000446		Page (3) 1 OF 5					
Title (4) CONDITION PROHIBITED BY TECHNICAL SPECIFICATIONS											
Event Date (5)		LER Number (6)			Report Date (7)			Other Facilities Involved (8)			
Month	Day	Year	Year	Sequential Number	Revision Number	Month	Day	Year	Facility Name	Docket Numbers	
01	13	04	04	001	00	03	12	04	N/A	05000	
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)(i)			50.73(a)(2)(i)(C)		50.73(a)(2)(vii)	
Power Level (10)		20.2201(d)			20.2203(a)(3)(ii)			50.73(a)(2)(ii)(A)		50.73(a)(2)(viii)(A)	
99.5		20.2203(a)(1)			20.2203(a)(4)			50.73(a)(2)(ii)(B)		50.73(a)(2)(viii)(B)	
		20.2203(a)(2)(i)			50.36(c)(2)(i)(A)			50.73(a)(2)(iii)		50.73(a)(2)(ix)(A)	
		20.2203(a)(2)(ii)			50.36(c)(1)(ii)(A)			50.73(a)(2)(iv)(A)		50.72(a)(2)(x)	
		20.2203(a)(2)(iii)			50.36(c)(2)			50.73(a)(2)(v)(A)		73.71(a)(4)	
		20.2203(a)(2)(iv)			50.46(a)(3)(ii)			50.73(a)(2)(v)(B)		73.71(a)(5)	
		20.2203(a)(2)(v)			50.73(a)(2)(i)(A)			50.73(a)(2)(v)(C)		OTHER	
		20.2203(a)(2)(vi)			X 50.73(a)(2)(i)(B)			50.73(a)(2)(v)(D)		Specify in Abstract below or in NRC Form 366A	
Licensee Contact For This LER (12)											
Name Timothy Hope - Regulatory Performance Manager							Telephone Number (Include Area Code) 254-897-6370				
Complete One Line For Each Component Failure Described in This Report (13)											
Cause	System	Component	Manufacturer	Reportable To EPIX		Cause	System	Component	Manufacturer	Reportable To EPIX	
				N							
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)											
<p>On January 13, 2004, Comanche Peak Steam Electric Station (CPSES) Unit 2 was in Mode 1 operating at 99.5 percent power. At 1520 hours, Operations personnel discovered that an isolation valve associated with a Refueling Water Storage Tank (RWST) level transmitter reference leg was mispositioned. With this valve mispositioned, an RWST level channel was determined to have been inoperable for a period of time longer than allowed by the Technical Specifications.</p> <p>TXU Generation Company LP (TXU Energy) believes that the cause of the event was failure by an Instrument & Control (I&C) Technician to return an isolation valve to the correct position during the performance of sensor response time testing on an RWST level transmitter. Corrective actions include reinforcement of expectations, procedure revisions, and verification of the position of other similar valves.</p> <p>All times in this report are approximate and Central Standard Time unless noted otherwise.</p>											

NRC FORM 366A
(1-2001)**LICENSEE EVENT REPORT (LER)**

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		04	001	00	

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

I. DESCRIPTION OF REPORTABLE EVENT**A. REPORTABLE EVENT CLASSIFICATION**

Any operation or condition prohibited by the plant's Technical Specifications.

B. PLANT OPERATING CONDITIONS PRIOR TO THE EVENT

On January 13, 2004, Comanche Peak Steam Electric Station (CPSSES) Unit 2 was in Mode 1, Power Operation, operating at 99.5 percent power.

C. STATUS OF STRUCTURES, SYSTEMS, OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

There were no inoperable structures, systems, or components that contributed to the event.

D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES

On January 6, 2004, Comanche Peak Steam Electric Station (CPSSES) Unit 2 was in Mode 1 operating at 99.5 percent power. At 0804 hours, an Instrument and Control (I&C) Technician (utility, non-licensed) was performing sensor response time testing on Channel III Refueling Water Storage Tank (RWST) level transmitter 2-LT-0932 [EIS:(BQ)(TK)(LT)]. During this test, a reference leg isolation valve [EIS:(BQ)(LT)(ISV)] is closed and then reopened. During performance of the test the valve was closed, however, due to personnel error it was inadvertently left in the closed position after completion of the test. With the valve closed, the level transmitter was not able to properly respond to changing water level in the RWST after completion of the test.

On January 13, 2004, at 1520 hours, while investigating an RWST low level alarm [EIS:(BQ)(TK)(LA)], Operators (utility, licensed) in the Unit 2 Control Room discovered that the reference leg isolation valve associated with level transmitter 2-LT-0932 was closed. RWST level channel 2-L-0932 was declared inoperable and Technical Specification 3.3.2 was entered. This Technical Specification requires that the inoperable channel be placed in bypass within 6 hours or the affected Unit must be in Mode 3 within 12 hours. Channel 2-L-0932 was inoperable from January 6, 2004 to January 13, 2004, and this exceeded the TS completion time of 12 hours to be in Mode 3. Therefore, a reportable condition prohibited by the Technical Specifications occurred.

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

E. THE METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE, OR PROCEDURAL OR PERSONNEL ERROR

While investigating an RWST low level alarm, Operators (utility, licensed) in the Unit 2 Control Room discovered that the reference leg isolation valve associated with the Unit 2 Channel III RWST level transmitter was closed.

II. COMPONENT OR SYSTEM FAILURES**A. FAILURE MODE, MECHANISM, AND EFFECTS OF EACH FAILED COMPONENT**

Not applicable – No component failures were identified during this event.

B. CAUSE OF EACH COMPONENT OR SYSTEM FAILURE

Not applicable – No component or system failures were identified during this event.

C. SYSTEMS OR SECONDARY FUNCTIONS THAT WERE AFFECTED BY FAILURE OF COMPONENTS WITH MULTIPLE FUNCTIONS

Not applicable – No component failures were identified during this event.

D. FAILED COMPONENT INFORMATION

Not applicable – No component failures were identified during this event.

III. ANALYSIS OF THE EVENT**A. SAFETY SYSTEM RESPONSES THAT OCCURRED**

Not applicable – No safety system responses occurred as a result of this event.

B. DURATION OF SAFETY SYSTEM TRAIN INOPERABILITY

RWST level channel 2-L-0932 was inoperable from January 6, 2004 to January 13, 2004.

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C. SAFETY CONSEQUENCES AND IMPLICATIONS

The RWST level channels are necessary for initiating the semi-automatic switchover of the Emergency Core Cooling System (ECCS) suction from the RWST to the containment sump. Four channels are available; however, because there is no automatic control function associated with these functions, only three channels are required in order to satisfy the single failure criterion and provide the required redundancy. Throughout the duration of the event, the minimum required number of channels (three) was available. Therefore, the three operable level channels would have adequately initiated the ECCS switchover, if required.

In addition, during the seven days that level channel 2-L-0932 was inoperable, no event occurred that required the automatic switchover to containment sump function. These channels are highly reliable and had an event occurred that required this function, it is highly likely that the two-out-of-four logic would have been satisfied.

There were no safety system functional failures associated with this event.

Based on the above, it is concluded that the event of January 13, 2004, did not adversely affect the safe operation of CPSES Unit 2 or the health and safety of the public.

IV. CAUSE OF THE EVENT

TXU Generation Company LP believes that the cause of the event was the failure by an I&C Technician to return an isolation valve to the correct position during the performance of sensor response time testing on an RWST level transmitter. The sensor response time test procedure contributed to the personnel error because it had not been updated to reflect changes from a recent plant modification and as a result it was missing steps related to manipulation of the reference leg isolation valve. In addition, the personnel performing the test did not meet management expectations to stop the test and restore the proper configuration when procedure problems were encountered.

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

V. CORRECTIVE ACTIONS

Upon discovery, the reference leg isolation valve was opened, a channel check was performed, and channel 2-L-0932 was declared operable on January 13, 2004, at 1630 hours. The reference leg isolation valves associated with the three other RWST level channels on Unit 2 and the four RWST level channels on Unit 1 were checked and verified to be in the correct position. The eight affected response time test procedures for Units 1 and 2 were revised to include the missing steps related to manipulation of the reference leg isolation valve. Expectations were reinforced with the I&C Technician that performed the sensor response time test.

As a part of the CPSES corrective action program, the following actions will be taken to prevent recurrence:

1. The Maintenance procedure revision process will be enhanced to aid Maintenance personnel in the identification of procedures that require revision as a result of modifications to the plant.
2. Management expectations regarding the expected response to an inadequate procedure will be reinforced with appropriate personnel.

VI. PREVIOUS SIMILAR EVENTS

There has been one other reportable event in the last three years that involved valves left in the incorrect position (see LER 446/03-003). However, the cause of that event was sufficiently different such that the previous corrective actions could not have prevented this event.