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# MAY 1 5 2006

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U.S. Nuclear Regulatory Commission Attn: Document Control Desk Mail Stop OP1-17 Washington, DC 20555

# SUSQUEHANNA STEAM ELECTRIC STATION LICENSEE EVENT REPORT 50-387/2006-002-00 LICENSE NO. NPF-14 PLA-6043

#### **Docket No. 50-387**

Attached is Licensee Event Report 50-387/2006-002-00. This event was determined to be reportable under 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications.

On March 23, 2006 during a refuel outage it was discovered that a required pre-modification Local Leak Rate test (LLRT) on a containment penetration had not been performed as required by the station's containment leakage rate program. This constituted a missed surveillance in accordance with the plant's Technical Specification surveillance requirement SR 3.6.1.1.1. Because the original configuration no longer existed, the containment leakage rate prior to the modification could not be quantified.

This event did not result in any actual adverse consequences to the health and safety of the public.

No commitments are associated with this LER.

Robert Saccone

Vice President – Nuclear Operations

Attachment

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Document Control Desk PLA-6043

cc: Mr. S. Collins Regional Administrator U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

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Mr. Alan Blamey Sr. Resident Inspector U.S. Nuclear Regulatory Commission P.O. Box 35 Berwick, PA 18603-0035

Mr. R. Osborne Allegheny Electric Cooperative P. O. Box 1266 Harrisburg, PA 17108-1266

Mr. R. R. Janati Bureau of Radiation Protection Rachel Carson State Office Building P. O. Box 8469 Harrisburg, PA 17105-8469

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Ŷ	NRC FORM 366U.S. NUCLEAR REGULATORY(6-2004)COMMISSION								APPROVED BY OMB: NO. 3150-0104 EXPIRES: 06/30/2007 Estimated burden per response to comply with this mandatory 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 and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Benuidatory Commission, Washington, DC 20555-0001 or bu integrated									
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This event did not result in any actual adverse consequences to the health and safety of the public.

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C FORM 366A

#### LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET		6. LER NUMBER	3. PAGE		
Susquehanna Steam Electric Station Unit 1	05000387	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
	05000387	2006	002	00	2 OF 3	

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

# PLANT CONDITIONS AT TIME OF EVENT

Unit 1, Mode 5, 0% Unit 2, Mode 1, 100%

## **EVENT DESCRIPTION**

On March 10, 2006 with Unit 1 in Mode 5 for a refuel outage, Maintenance workers breached a containment electrical penetration (EIIS:PEN) to install coax cable as part of a planned modification. The station Containment Leakage Rate Testing Program requires a LLRT prior to performing any maintenance or modification to Appendix J penetrations that may alter the leakage rate of the penetration during an Integrated Leak Rate Test (ILRT) outage. An ILRT was planned as part of the outage. Because the existing conditions no longer existed, the pre-modification leakrate for the penetration could no longer be quantified. In accordance with plant Technical Specification surveillance requirement SR 3.6.1.1.1, this constituted a missed surveillance and is reportable under 10CFR 50.73(a)(2)(i)(B) as a violation of Tech Specs.

This event did not result in any actual adverse consequences to the health and safety of the public.

# CAUSE OF THE EVENT

The apparent cause was a mis-application of the Appendix J Program requirements by the program engineer. During a pre-outage review of the modification, the program engineer made an assessment that the leak rate values from the last performed LLRT could be utilized for the pre-modification leak rate. This decision was based on the fact that the penetration was a passive barrier and had an excellent history for leakrate results (it was on an extended test frequency). The program requirements for an ILRT outage clearly mandate a pre-modification LLRT to confirm the integrity of the peneration, even for penetrations on an extended test frequency. This pre-outage review also did not have a peer review to evaluate the scope of outage work activities.

## **ANALYSIS / SAFETY SIGNIFICANCE**

#### **Actual Consequences**

There were no actual consequences to this event. Based on previous LLRT results, the penetration has historically met its administrative limits and was on an extended test frequency. The reactor was shutdown in mode 5 when the event occurred. The penetration was not required to be operable at the time of the event.

#### **Potential Consequences**

The potential existed that the penetration would have been degraded, resulting in a test failure. Failure to maintain the primary containment leakage limits within the 10CFR 50 Appendix J requirements could result in exceeding the calculated radiological limits under 10CFR 100.

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#### U.S. NUCLEAR REGULATORY COMMISSION

# LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET		6. LER NUMBER	3. PAGE		
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17. NARRATIVE (If more space is required, use additional copies of NRC Form 366A)

# **CORRECTIVE ACTIONS**

**Completed Actions** 

1) Because the penetration was disturbed during the modification, the periodic testing requirement was reestablished at a 30 month interval.

#### **Planned Actions**

- 1) Review scheduled work on similar containment penetrations governed by the Appendix J Program for the 2007 Unit 2 Refuel Outage.
- 2) Provide for a peer review of final LLRT/ILRT outage plans and testing requirements prior to future outages.

#### **ADDITIONAL INFORMATION**

Past similar events: Docket 50-387 LER 00-001-00