U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Indian Point Unit No. 2	0 5 0 0 0 2 4 7	1 OF 0 3

TITLE (4)
Procedural Deficiency Prevents Obtaining "As Found" Test Data

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 NAMES	DOCKET NUMBER(S)
1 1	0 6	8 7	8 7	0 1 4	0 0	1 2		8 7		0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9): N

POWER LEVEL (10): 0 0 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER: AREA CODE	
Joseph Gobel, Manager, Test & Performance	9 1 4	5 2 6 - 5 1 8 0

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

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

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

On November 6, 1987 while the plant was at cold shutdown for a refueling outage, two steam generator level transmitters were conservatively declared inoperable since "as found" data could not be obtained during a surveillance test. Both level transmitters monitor one steam generator.

"As found" data could not be obtained due to adjustments which were made by a technician during the surveillance. The adjustments were made since reproducible measurements could not be taken. Although not recognized at the time, reproducible results could not be obtained due to water entrapment. The cause of the event is that the test procedure failed to identify whether a "dry" or "wet" test method should be employed in the surveillance.

The health and safety of the public were not affected.

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Plant and System Description:

Westinghouse 4-loop pressurized water reactor

Identification of Occurrence:

Procedure weakness prevents obtaining "as found" data

Event Date: November 6, 1987

Report Due Date: December 6, 1987

Reference:

Significant Occurrence Report (SOR) 87-552

Prior Similar Occurrences:

None

Description of Occurrence:

On November 6, 1987 while the plant was at cold shutdown for a refueling outage, two steam generator level transmitters were conservatively declared inoperable since "as found" data could not be obtained during a surveillance test and therefore assumed to be out of calibration. Both level transmitters monitor one steam generator.

Technicians following Test Procedure PC-R7, Revision 7, "Steam Generator Level Transmitter", attempted to "dry" calibrate the first transmitter. However, reproducible results could not be obtained for a constant pressure source. At this point, adjustments were made in an attempt to obtain reproducible results but without success. The same procedure was followed on the second transmitter with similar negative results. The technician's supervisor was contacted and the source of the problem was identified as the method of calibration employed. The technician had attempted to "dry" calibrate the transmitter. This was not possible due to water entrapment. The preferred method of calibration is "wet"; however, the test procedure was silent on the method to be employed. No previous problem had occurred since other technicians were aware, based on their experience, as to which calibration method to use.

The remaining 10 transmitters were calibrated using the "wet" method without problems.

Analysis of Occurrence:

This report is being made since multiple channels in safety related instrumentation were declared inoperable due to a common cause.

Since it is only possible to perform this calibration during refueling outages, no justification can be found which would indicate that these transmitters were not in fact in proper calibration during plant operation. In accordance with Technical Specification Table 4.1-1, the steam generator level channels are tested for trip accuracy monthly during power operation. Process system instrumentation channels are subject only to the "drift" error induced within the instrumentation itself, and consequently, can tolerate longer intervals between calibration. Instrumentation "drift" error is expected to remain within acceptable tolerances, and recalibration is thus performed at each refueling.

Upon completion of calibration utilizing the wet based calibration method, all level transmitters were calibrated acceptably and are considered operable.

If it were to be assumed that the transmitters were inoperable when the unit was at power, then some instrumentation which is relied upon during a loss of feedwater event would not have been available. In such an event a reactor trip and auto-start of both motor driven pumps results from a low-low water level signal from any steam generator. Since the logic employed is two out of three, and since the two transmitters monitor one steam generator, one of the four available instrumentation channels would have been lost. Of course, channels for the remaining three steam generators would have remained available. There would have been no impact on the health and safety of the public.

Cause of Occurrence:

The current procedure for steam generator level transmitter calibration does not address utilizing a wet based calibration method for determining "as found" data. This deficiency in the procedure methodology can preclude accurate measurement of "as found" calibration data.

Corrective Action:

Test and calibration procedure PC-R7, Revision 7, "Steam Generator Level Transmitter" will be revised to address utilizing a wet based calibration method when determining "as found" data.

Con Edison
Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, New York 10511-1099

December 11, 1987

Re: Indian Point Unit No. 2
Docket No. 50-247
LER 87-14-00

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

The attached Licensee Event Report LER-87-14-00 is hereby submitted in accordance with the requirements of 10 CFR 50.73.

Very truly yours,

Stephen Bram
Vice President
Nuclear Power

Attachment

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