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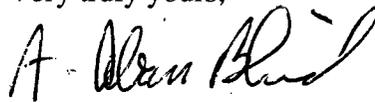
March 22, 1997

Re: Indian Point Unit No. 2
Docket No. 50-247
LER 99-03-00

Document Control Desk
US Nuclear Regulatory Commission
Mail Station PI-137
Washington, DC 20555

The attached Licensee Event Report 99-03-00 is hereby submitted in accordance with the requirements of 10 CFR 50.73.

Very truly yours,



Attachment

C: Mr. Hubert J. Miller
Regional Administrator - Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

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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 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If an 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)

Indian Point No. 2

DOCKET NUMBER (2)

05000-247

PAGE (3)

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TITLE (4)

Missed Technical Specification Surveillance Interval

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 NUMBER
2	19	1999	1999	-- 3	-- 0	3	22	1999		05000
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)				
		20.2201(b)		20.2203(a)(2)(v)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)
POWER LEVEL (10)	99	20.2203(a)(1)		20.2203(a)(3)(i)	50.73(a)(2)(ii)	50.73(a)(2)(x)
		20.2203(a)(2)(i)		20.2203(a)(3)(ii)	50.73(a)(2)(iii)	73.71
		20.2203(a)(2)(ii)		20.2203(a)(4)	50.73(a)(2)(iv)	OTHER
		20.2203(a)(2)(iii)		50.36(c)(1)	50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
		20.2203(a)(2)(iv)		50.36(c)(2)	50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

John P. Beck, Senior Engineer

TELEPHONE NUMBER (Include Area Code)

(914) 734-5692

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

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 15 single-spaced typewritten lines) (16)

On February 19, 1999, with the unit at approximately 99 percent power, it was discovered that the surveillance test for PT-M72, Liquid Process Radiation Monitor Functional Test, had not been performed in its entirety and two monitors (R-39, liquid effluent monitor for Service Water from the Component Cooling Water heat exchanger outlet and R-59, house service boiler condensate return line) had exceeded the surveillance test interval specified by Technical Specification. Further, the subsequent investigation revealed that R-8, an area radiation monitor for the Unit 2 Drumming Station, also exceeded the surveillance test interval specified by Technical Specification. Subsequently, the required surveillances for R-39 and R-59 were performed successfully, and the limiting condition of operation was exited. R-8 currently remains out of service pending completion of repairs to the drumming station door which is difficult and unsafe to operate. The door inoperability results in the door being maintained in the closed position thereby making entry and completion of the R-8 surveillance test not practicable. A Request for Engineering Services (RES) has been made to permanently retire the R-8 area radiation monitor.

Human error has been cited as the cause of the test completion being incorrectly reported. Process enhancements to be implemented include reinforcing the expectations of test performance with the organizations that perform these tests ensuring that any deviations from the test scope are approved by the Test Engineer and Shift Watch Supervisor (SWS), and accurately reported.

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(6-1988)

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PLANT AND SYSTEM IDENTIFICATION:

Westinghouse 4-Loop Pressurized Water Reactor

IDENTIFICATION OF OCCURRENCE:

Review of monthly radiation monitor performance test data.

EVENT DATE:

February 19, 1999

REPORT DUE DATE:

March 22, 1999

REFERENCES:

Condition Reporting System (CRS) Nos. 199900344, 199901251 and 199901252

PAST SIMILAR OCCURRENCE:

LER 1988-005, 1992-019, 1996-017, 1998-001 1998-017

DESCRIPTION OF OCCURRENCE:

On February 19, 1997, at approximately 10:30 hours, a Test Engineer reviewing the results of the PT-M72, Liquid Process Radiation Monitor Functional Test, determined that the test results were unacceptable. The comments section of the PT-M72 test noted that R-39 (liquid effluent monitor for Service Water from the Component Cooling Water heat exchanger outlet) and R-59 (house service boiler condensate return line) were identified as out of service (OOS) and work orders 98-04925 and 99-06222 were listed respectively for the monitors. As a result, PT-M72 was not completed in its entirety and the Technical Specification required functional test interval, including the Technical Specification grace period allowance of 25 percent, was exceeded on February 11, 1999 for R-39 and R-59.

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The PT-M72 acceptance criteria for these monitors had not been annotated as "UNSAT"; instead they were asterisked (*) and referred to in the test's comment section. The Test Engineer reviewed the work orders referenced to ascertain if the post maintenance tests (PMT) for those work orders identified the need to perform the appropriate portions of the PT-M72. Due to the nature of work being performed under the specified work orders, repair of leaks on the sample pumps, there was no need to perform the required elements of the PT-M72. Therefore, PT-M72 was not specified as a required test to satisfy the PMT requirements. As a result, the PT-M72 functional tests for R-39 and R-59 were not completed when initially scheduled and were not rescheduled.

Additionally, during the review of the Radiation Monitoring System status of R-39 and R-59, it was discovered that R-8, an area monitor for the Primary Auxiliary Building (PAB) drumming station, was beyond its Technical Specification required functional test interval. The Primary Auxiliary Building Waste Drumming station was previously used for handling and shipping of contaminated materials and solid waste drums. Currently, the drumming station is no longer used for storage of contaminated waste, it is now used to store janitorial supplies. The existing manually actuated steel sliding door is currently maintained in the closed position. Repairs are required to this door to facilitate ease of operation as the door currently is disengaged from its operating mechanism.

The test engineer's review of PT-M10B, Area Radiation Monitor Functional, revealed that the R-8 monitor was not tested due to the technicians being unable to gain access. It was noted that a previous CR was written for R-8 on January 15, 1999; under the "operability concern" response the originator put "uncertain". Operability was subsequently evaluated by the watch and confirmed as "yes". The operability review section of the CR has "yes" for "is the CR in an area or interface with a System Structure Component (SSC) from the applicable list?" and "is the CR a failure of any portion of a surveillance test, or does the condition describe a missed or late surveillance test?" The initial work order to effect repair of the door was a priority 3. This priority does not recognize the operability issue of the CR. This work order was subsequently canceled to a duplicate existing work order. The original work order for the missed functional test had RMS (Radiation Monitoring System) as the system and indicated the reason for the work order was inability to perform the RMS test. The duplicate work order is for the repair of the drumming station door, and is a priority 2 work order noted to require a roving fire watch but does not mention the system as RMS. This duplicate work order was then deferred to Engineering for a modification. The work to effect repair to the drumming station door is still pending. Accordingly, R-8 is being carried as inoperable until a functional test of R-8 can be successfully completed. Compensatory actions are not required due to the fact there are no contaminated materials in the drumming stations area. An Request for Engineering Service has been requested to permanently retire R-8, as it no longer serves any purpose.

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ANALYSIS OF OCCURRENCE :

The plant was in a condition prohibited by Technical Specifications reportable under 10 CFR 50.73(a)(2)(D)(b). The basis of reportability for R-39 and R-59 is that the Technical Specification 4.1.a requirement for radioactive liquid effluent monitoring instrumentation to be functionally tested and operable was not met. The basis for reportability of R-8 is that the Technical Specification 4.1.a requirement for a monitor, that is part of the area radiation monitoring system, to be functionally tested and operable was not met. There are no Technical Specification required compensatory actions for area radiation monitors.

There were no adverse safety implications as a result of this event. This event did not cause any injury to personnel or damage plant equipment.

CAUSE OF OCCURRENCE :

Previous corrective actions for missed surveillance testing were not fully effective in preventing these events. These corrective actions did not consider multiple components being tested by a single procedure.

The issue of work control and missed Technical Specification surveillance test intervals was previously addressed in our response to LER 1998-017-00. The activities implemented to preclude recurrence were:

- implementation of formal processes to define the responsibility for tracking surveillance test completion
- implementation of formal processes to define the responsibility for rescheduling surveillance tests, as required, when equipment is removed from the work schedule due to plant conditions.

In response to this occurrence the Test and Performance Section has developed a new report that tabulates all Technical Specification required incomplete surveillance tests that have gone into their Technical Specification required functional test interval including the Technical Specification grace period allowance of 25 percent. This new report is provided to Work Control, the various work groups and the section managers for their review and use in prioritizing work. The investigation of the causes of these events has concluded that the lack of understanding of the actions required by the watch for tracking components that have not completed functional testing (R-39 and R-59) were not tracked for Technical Specification functional testing purposes even though notes entered in PT-M72 indicated these monitors were out of service (OOS) at the time testing was conducted. R-8 was not entered into the log as a functional failure.

There was a lack of understanding by I&C of the requirements for documenting the untested components within a procedure. In the case of R-39 and R-59, these components were out of

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service (OOS) when the test was being conducted due to leaking sample pumps. Their OOS status was noted in the procedure by the I&C technician by use of an asterisk (*) which referred to the comment section of the procedure. The work order numbers for these monitors were also noted in the comment section. Neither the I&C technician nor the Shift Watch Supervisor (SWS) indicated R-39/ R-59 as "UNSAT", to be tracked as not completing a Technical Specification required functional test. Further, contrary to procedure, the test was inappropriately annotated using the asterisk to refer to remarks in the tests comment section.

There was a lack of understanding in the actions required by the watch for tracking components that did not complete functional testing. Therefore, R-39 and R-59 were not tracked for Technical Specification functional failures. In addition, R-8 was not functionally tested, the monitor was not entered into the control room log as a functional failure even though the Condition Report was determined to be Operability "YES".

Technical Specification compliance is tracked by exception rather than positive indicators. That is, once a test is on the schedule and the surveillance test cover sheet is returned, all components tested within that procedure are assumed as having completed the test. Any components failures in the test procedure are assumed as having completed the test. Any component failures in the test procedure should have a CR written against it, which would then cause repair and retest to that component. The items not tested and those OOS, were not considered as failures.

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CORRECTIVE ACTIONS:Immediate Actions:

The immediate corrective actions by the Test Engineer was to initiate CR number 199901251 for R-39 / R-59 and 199901252 for R-8.

Following the discovery that PT-M72 was not performed for R-39 and R-59, PT-M72 was successfully completed.

The functional testing of R-8 has not been performed as this activity is pending the completion of the Drumming Station door repair work. There are no Technical Specification required compensatory actions for area radiation monitors. An Engineering Service Request has been submitted for the permanent retirement of R-8.

Long Term Actions:

Develop a process that will identify equipment out of service, and its impact on routinely scheduled surveillance tests, prior to performing the test. This corrective action is scheduled for completion by May 15, 1999.

Reinforce the expectations of test performance with the organizations that performs the tests, to ensure that any deviations from the test scope are approved by the Test Engineer and Shift Watch Supervisor (SWS). This corrective action is scheduled for completion by April 1, 1999.

An "Incomplete Surveillance" log will be developed and maintained in the CCR with the requirement to be reviewed by each shift at turnover. This log will also list the surveillance test expiration date for each incomplete surveillance. The creation and deployment of the "Incomplete Surveillance" log is scheduled for April 30, 1999.