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AUTH.NAME AUTHOR AFFILIATION

DRESSEN, J.D. Wisconsin Public Service Corp. SCHROCK, C.A. Wisconsin Public Service Corp.

RECIPIENT AFFILIATION

SUBJECT: LER 92-019-00:on 921028, personnel failed to perform surveillance procedure within required period, due to misunderstood verbal communication. Personnel counseled & event will be used as tool for training. W/921125 ltr.

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November 25, 1992

10 CFR 50.73

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

Gentlemen:

Docket 50-305 Operating License DPR-43 Kewaunee Nuclear Power Plant Reportable Occurrence 92-019-00

In accordance with the requirements of 10 CFR 50.73, "Licensee Event Report System," the attached Licensee Event Report for reportable occurrence 92-019-00 is being submitted.

Sincerely,

C. G. Schock

C. A. Schrock Manager-Nuclear Engineering

VJC\jac

Attach.

cc - INPO Records Center
Mr. Patrick Castleman, US NRC
US NRC, Region III

16.321

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On October 28, 1992, with the plant at 100 percent power, Surveillance Procedure (SP) 87-125, "Shift Instrument Channel Check - Operating," was being performed. The performance of SP87-125 assures acceptable operability of each instrument channel by comparison of the channel with other independent instrument channels measuring the same variable.

During the performance of SP87-125, Steam Generator (SG) B Feedwater (FW) flow instrument FI-476 was out of service. With this instrument out of service, data was not available for comparison to the redundant B SG flow instrument and the appropriate B SG steam flow channel. Data from flow instrument FI-476 is also used for the secondary calorimetric calculation and comparison to nuclear instrumentation required by SP 87-125.

A Surveillance Procedure Exception Report was issued to allow the other surveillances of the procedure to be completed with flow instrument FI-476 out of service within the required surveillance period. As a result of a miscommunication between control room staff, personnel failed to perform shift channel checks for the FW and steam flow instrument channels that remained in service within the required surveillance period.

The cause of this event was determined to be misunderstood verbal communication.

The individuals involved were counseled on the importance of good communication and performing the required surveillance in the specific time period. This event will also be used as a tool for communications training.

NRC Form 386A (1983) LICENSEE EVENT R	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION							
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Description of Event

On October 28, 1992, with the plant at 100 percent power, Surveillance Procedure (SP) 87-125, "Shift Instrument Channel Check - Operating," was being performed. This SP is required to be performed every 8 hours. The SP assures operability of each instrument channel by comparison of the channel with other independent instrument channels measuring the same variable.

During the performance of the procedure, Steam Generator (SG) B Feedwater (FW) Flow instrument [FT] FI-476 was out of service for calibration. Because FW flow instrument FI-476 was out of service, readings associated with this instrument were not available for comparison to the redundant SG B flow instrument [FT] FI-477 and associated B SG steam flow channel. Data from FW flow instrument FI-476 is also used to perform a secondary calorimetric calculation and subsequent comparison to nuclear instrumentation required by SP87-125. The SP was required to be finished at 1627 on September 28, 1992. This includes the 25 percent surveillance period extension allowed by Technical Specifications (TS).

When it was determined that FW flow instrument FI-476 would not be returned to service within the allotted surveillance interval, the Shift Supervisor (SS) and the Reactor Operator (RO) discussed completing the SP by issuing a Surveillance Procedure Exception Report (SPER) which would allow the balance of the remaining channel checks to be completed. When FW

NRC Form 386A (9-83) LICENSEE EVENT REPORT (LER) TEXT CONTINUATION APPROVED OMB NO. EXPIRES: 8/31/85							
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flow instrument FI-476 was returned to service, indication from FI-476 would be compared to the appropriate instrument channels at that point in time.

The RO generated the SPER as directed by the SS; however, he misunderstood the SS's instructions and did not record the data nor perform the channel checks associated with FW and steam flows to the A or B SG until FI-476 was returned to service at 1737. The following data was recorded after the surveillance was required to be finished:

- I. SG B FW Flow from instrument FI-477
- 2. SG A FW Flow from instruments FI-466, FI-467
- 3. SG B Steam Flow from instruments FI-474, FI-475
- 4. SG A Steam Flow from instruments FI-464, FI-465

The secondary calorimetric and comparison to nuclear instrumentation were also performed. When the SP was completed at 1737 all indications were within procedural limits.

Cause of the Event

Misunderstood verbal communication was determined to be the cause of the event. The SS was trying to communicate to the RO to issue the SPER and finish the other surveillances of the SP without the data associated with B FW flow instrument FI-476. The RO issued the SPER but did not record the available data from the other three FW flow instruments, the four SG steam

(9-83) LICENSEE EVENT R	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION							
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flow channels, nor complete the secondary calorimetric calculation and channel check comparison to the nuclear power range instruments.

Analysis of Event

Kewaunee's TS do not define shift; however, traditionally shift has been interpreted as 8 hours. This is not consistent with Standard TS which defines shift as 12 hours. Since SP87-125 was not completed in the traditionally interpreted time of 8 hours, the event is conservatively reported as a violation of TS in accordance with 10 CFR50.73(a)(2)(i)(B). By not completing SP87-125 in the required time, the required surveillances of Table TS 4.1.a items I and 12 were not met.

The Operations Department at Kewaunee Nuclear Power Plant has recently switched from 8 to 12 hour shifts. Procedures that are required to be completed each shift are still performed every 8 hours. A definition of shift is being developed and will be submitted to update the TS.

There was no increased risk to the health and safety of the public. All the requirements, with the exception of the completion time, of SP87-125 were met.

NRC Form 306A (9-83) LICENSEE EVENT RI	JATION	U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES' 8/31/85									
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Corrective Actions

- 1. The SS and the RO responsible for this event were counseled on the importance of completing required surveillances within the required time and the necessity for clear and complete communication.
- 2. This report will be required reading for the operations staff to remind the staff the importance of good communications. Furthermore this event will be discussed as part of the communications section during operations requalification training.

Additional Information:

Equipment Failure: None.

Similar Events: None.