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U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

ATTENTION: Document Control Desk

SUBJECT: R.E. Ginna Nuclear Power Plant  
Renewed Facility Operating License No. DPR-18  
Docket No. 50-244

LER 2015-001, Human Performance Error During Data Collection Activity  
Results in a Condition Prohibited by Technical Specification 3.1.7 "Rod  
Position Indication"

The attached Licensee Event Report (LER) 2015-001 is submitted under the provisions of NUREG-1022, Event Reporting Guidelines. There are no new commitments contained in this submittal. This submittal is for revision 1 of the LER.

Should you have any questions regarding this submittal, please contact Thomas Harding at 315-791-5219.

Sincerely,

WC/kc

Attachment: LER 2015-001

cc: NRC Regional Administrator, Region I  
NRC Project Manager, Ginna  
NRC Resident Inspector, Ginna

WPLNRC-1003014

LE22  
MLR

**Attachment**

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**LER 2015-001**

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**LICENSEE EVENT REPORT (LER)**  
(See Page 2 for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to [Infocollects.Resource@nrc.gov](mailto:Infocollects.Resource@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 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.

<b>1. FACILITY NAME</b> R. E. Ginna Nuclear Power Plant	<b>2. DOCKET NUMBER</b> 05000244	<b>3. PAGE</b> 1 OF 3
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**4. TITLE**  
Human Performance Error During Data Collection Activity Results in a Condition Prohibited by Technical Specification 3.1.7 "Rod Position Indication"

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
06	30	2015	2015	001	01	09	24	2015	FACILITY NAME	DOCKET NUMBER 05000

<b>9. OPERATING MODE</b>	<b>11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)</b>			
1	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
100	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A

**12. LICENSEE CONTACT FOR THIS LER**

LICENSEE CONTACT Thomas Harding	TELEPHONE NUMBER (Include Area Code) 315-791-5219
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**13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT**

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

<b>14. SUPPLEMENTAL REPORT EXPECTED</b> <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	<b>15. EXPECTED SUBMISSION DATE</b>	MONTH	DAY	YEAR

**ABSTRACT** (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On June 30, 2015, during rod movement testing, it was discovered that the data recorder temporarily installed as a secondary method of monitoring the position of control rod L06 was not available due to an incorrect trigger setting. The cause of the incorrect trigger setting was a human performance error during manipulation of the data recorder on June 28, 2015. Prior to this event, the primary method of monitoring position indication for control rod L06, the Plant Process Computer System (PPCS), had also been declared inoperable to perform maintenance due to a hardware malfunction. The malfunction had been resolved prior to this event and PPCS indication was available. However, at the time of the data recorder unavailability PPCS indication for control rod L06 was still administratively considered to be inoperable. Therefore, Ginna was administratively not reviewing the rod control system for indications of rod movement for a rod with an inoperable position indicator (control rod L06) during the time the data recorder was unavailable. It was later determined this condition existed for approximately 36 hours. This was not in accordance with requirements stated in Technical Specification (TS) Limiting Condition for Operation (LCO) 3.1.7.A.3.2 Rod Position Indication.

This event is reportable under 10CFR50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications.



**LICENSEE EVENT REPORT (LER)  
CONTINUATION SHEET**

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
		YEAR	SEQUENTIAL NUMBER	REV NO.	
R.E. Ginna Nuclear Power Plant	05000244	2015	- 001	- 01	3 OF 3

**NARRATIVE**

**E. CORRECTIVE ACTIONS:**

1. Eliminated the reliance of a trigger to start data capture. Data is now stored continually on stored files, which are downloaded to a thumb drive for viewing. This eliminates inadvertent file manipulations and/or possible corruption during mode transfer.
2. Increased monitoring frequency of the data.
3. Revised work documents with appropriate guidance and controls.

**F. PREVIOUS SIMILAR OCCURRENCES**

None.

**G. COMPONENT FAILURE DATA**

Not applicable, no components failed during this event.