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SISK,D.P. Pacific Gas & Electric Co.
RUEGER,G.M. Pacific Gas & Electric Co.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-017-00:on 920912,time limit for surveillance required by TS 4.11.2.6,including allowed extension of TS 4.0.2 not met.Caused by inadequate turnover checklist instructions. CAP D-18 will be revised as required by TS.W/921009 ltr.

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RIDS/ADDS

Pacific Gas and Electric Company

77 Beale Street
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Gregory M. Rueger
Senior Vice President and
General Manager
Nuclear Power Generation

October 9, 1992

PG&E Letter No. DCL-92-219

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

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Licensee Event Report 1-92-017-00
Technical Specification 3.11.2.6 Not Met due to Inadequate Instructions on the Shift Chemistry Technician Turnover Checklist

Gentlemen:

Pursuant to 10 CFR 50.73(a)(2)(i)(B), PG&E is submitting the enclosed Licensee Event Report concerning a missed surveillance of the gas decay tanks due to inadequate instructions of the shift chemistry technician turnover checklist. This surveillance is required by Technical Specification 4.11.2.6.

This event has in no way affected the health and safety of the public.

Sincerely,

Gregory M. Rueger

cc: Ann P. Hodgdon
John B. Martin
Philip J. Morrill
Harry Rood
CPUC
Diablo Distribution
INPO

DC1-92-TC-N041

Enclosure

1060S/85K/SDL/2246

IE22

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
DIABLO CANYON UNIT 1	0 5 0 0 0 2 7 5	1 OF 5

TITLE (4) TECHNICAL SPECIFICATION 3.11.2.6 NOT MET DUE TO INADEQUATE INSTRUCTIONS ON THE SHIFT CHEMISTRY TECHNICIAN TURNOVER CHECKLIST

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MON	DAY	YR	YR	SEQUENTIAL NUMBER	REVISION NUMBER	MON	DAY	YR	FACILITY NAMES	DOCKET NUMBER (S)
09	12	92	92	- 0 1 7 -	0 0	10	09	92	DIABLO CANYON UNIT 2	0 5 0 0 0 3 2 3
										0 5 0 0 0

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR: (11)
POWER LEVEL (10)	0 8 0	X 10 CFR 50.73(a)(2)(i)(B) OTHER - (Specify in Abstract below and in text, NRC Form 366A)

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER AREA CODE	TELEPHONE NUMBER
DAVID P. SISK, SENIOR REGULATORY COMPLIANCE ENGINEER	805	545-4420

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

ABSTRACT (16)

On September 12, 1992, at 1420 PDT, the time limit for the surveillance required by Technical Specification (TS) 4.11.2.6, including the allowed extension of TS 4.0.2, was exceeded. This required entry into TS 3.11.2.6 action a., which requires immediate action that was not performed.

The root cause of this event was inadequate shift chemistry technician turnover checklist instructions. The checklist instructions failed to specify the time requirements of TS 4.11.2.6.

The shift chemistry technician turnover checklist was revised. Chemistry Analysis Procedure D-18, "Chemical Analysis Procedure Noble Gas Decay Tank(s) in Terms of Equivalent XE-133," will be revised to explicitly state the 24-hour time limit required by TS 4.11.2.6.

I. Plant Conditions

Unit 1 was in Mode 1 (Power Operation) at 80 percent power and Unit 2 was in Mode 1 (Power Operation) at 100 percent power.

II. Description of Event

A. Summary:

On September 12, 1992, at 1420 PDT, the time limit for the surveillance required by Technical Specification (TS) 4.11.2.6, including the allowed extension of TS 4.0.2, was exceeded when a technician failed to perform the required Units 1 and 2 gas decay tanks (GDTs)(WE)(TK) surveillance within the 24-hour time limit. At 1625 PDT, the technician completed the required TS 4.11.2.6 surveillance.

B. Background:

TS 4.11.2.6 requires that the quantity of radioactive material contained in each GDT shall be determined to be within the limit set forth in TS 3.11.2.6 at least once per 24 hours when radioactive materials are being added to the GDT.

Chemistry Analysis Procedure (CAP) D-18, "Chemical Analysis Procedure Noble Gas Decay Tank(s) in Terms of Equivalent XE-133," provides the methodology for determining the quantity of Xenon-133 in a GDT. CAP D-18 states the surveillance must be performed "daily". The shift chemistry technician turnover checklist is used to remind C&RP technicians of procedural requirements.

C. Event Description:

On September 11, 1992, at 0820 PDT, data required by TS 4.11.2.6 was collected from the GDTs.

The shift chemistry & radiation protection (C&RP) technician is assigned the responsibility for taking the daily GDT readings during the dayshift. The technician normally follows a morning routine, which includes monitoring of the GDTs. On the morning of September 12, 1992, the technician went to sample the Unit 2 steam generators (SGs)(AB)(HX), as well as the GDTs. When the technician went to sample the Unit 2 SG, he found the area was secured due to floor painting and would be reopened in the afternoon. The technician then went to complete other assigned duties, and planned to come back later in the afternoon to complete the Units 1 and 2 GDT surveillance.

On September 12, 1992, at 1420 PDT, the time limit for the surveillance required by TS 4.11.2.6, including the allowed extension

of TS 4.0.2, was exceeded. Also, TS 3.11.2.6 action a. was not met when the discharge of radioactive material to the GDT was not immediately stopped.

On September 12, 1992, at 1625 PDT, the TS 4.11.2.6 surveillance was performed and TS 3.11.2.6 was exited.

On September 12, 1992, at 1655 PDT, upon review of the Shift C&RP desk log, the Chemistry Foreman discovered that the TS 4.11.2.6 time limit, including the allowed extension of TS 4.0.2, was exceeded by 2 hours and 5 minutes.

D. Inoperable Structures, Components, or Systems that Contributed to the Event:

None.

E. Dates and Approximate Times for Major Occurrences:

1. September 11, 1992; at 0820 PDT: TS 4.11.2.6 surveillance requirements were satisfied.

2. September 12, 1992; at 1420 PDT: Event Date. TS 3.11.2.6 action a. not met.

3. September 12, 1992; at 1625 PDT: TS 4.11.2.6 surveillance was performed and TS 3.11.2.6 was exited.

4. September 12, 1992; at 1655 PDT: Discovery Date. The Chemistry Foreman discovered that the TS 4.11.2.6 surveillance time limit had been exceeded.

F. Other Systems or Secondary Functions Affected:

None.

G. Method of Discovery:

On September 12, 1992, at 1655 PDT, while reviewing the Shift C&RP desk log, the Chemistry Foreman discovered that the TS 4.11.2.6 time limit, including the allowed extension of TS 4.0.2, was exceeded by 2 hours and 5 minutes.

H. Operator Actions:

None.

I. Safety System Responses:

Not Applicable.

III. Cause of the Event

A. Immediate Cause:

The C&RP technician failed to perform the TS 4.11.2.6 surveillance within the required time limit.

B. Root Cause:

The root cause of this event was inadequate shift chemistry technician turnover checklist instructions. The instructions on the checklist specified that the surveillance was to be performed daily and did not specify that the surveillance was to be performed at least once per 24 hours as required by TS 4.11.2.6.

IV. Analysis of the Event

Radiation monitors (IL)(MON) are installed on each GDT to provide alarms in the auxiliary building control room (NF) and the main control room (NA) in the event that the quantity of radioactivity in the GDTs approaches the limit of 100,000 curies of noble gas (as Xenon-133 equivalent). If the limit is exceeded, all gaseous additions to the GDTs will be immediately suspended, and the GDT contents will be reduced to the allowed limit within 48 hours, as required by TS 3.11.2.6 action a.

The Unit 1 reactor coolant system (RCS)(AB) noble gas radioactivity source term was approximately 91 curies (as equivalent Xenon-133) and the Unit 2 RCS noble gas radioactivity source term was approximately 505 curies (as equivalent Xenon-133). Therefore, even if the entire noble gas inventory of both units were transferred to a single GDT, the total combined radioactivity would not have exceeded approximately 600 curies (as equivalent Xenon-133), or less than 1 percent of the limit specified in TS 3.11.2.6.

Thus, the missed GDT surveillance did not adversely affect the health and safety of the public.

V. Corrective Actions

A. Immediate Corrective Actions:

1. The C&RP technician was counseled on the time requirements of TS 4.11.2.6.

2. The shift chemistry technician turnover checklist was revised to state: "GDT dose rates and pressure readings in accordance with TS 4.11.2.6 and CAP D-18 required once per 24 hours ±1 hour."

B. Corrective Actions to Prevent Recurrence:

CAP D-18 will be revised to explicitly state the 24-hour time requirement as required by TS 4.11.2.6.

VI. Additional Information

A. Failed Components:

None.

B. Previous LERs on Similar Problems:

1. LER 1-88-001-00, "Failure to Perform Plant Vent Air Sampler Flow Estimate Required by Technical Specification 3.3.3.10 due to Personnel Error"

The cause of this event was personnel error in that a technician failed to perform actions identified in Administrative Procedure (AP) A-101S1, "Relieving the Watch." To prevent recurrence, the individual was counseled and the event was reviewed with all chemistry technicians. Because this event did not involve the chemistry technician turnover checklist instructions or ambiguities associated with the word "daily", the corrective actions did not prevent the current LER.

2. LER 1-90-013-00, "Missed Reactor Coolant System Sample due to Personnel Error"

The cause for this event was personnel error in that samples required by TS 4.4.8 were not identified to the oncoming midnight shift technician as required by AP A-101S1. To prevent recurrence, the shift C&RP technicians were counseled and AP A-101S1 was revised. Because this event did not involve the chemistry technician turnover checklist instructions or ambiguities associated with the word "daily", the corrective actions did not prevent the current LER.