

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9604190158 DOC. DATE: 96/04/15 NOTARIZED: NO DOCKET #
 FACIL: 50-275 Diablo Canyon Nuclear Power Plant, Unit 1, Pacific Ga 05000275
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 BEHNKE, D.H. Pacific Gas & Electric Co.
 FUJIMOTO, W.H. Pacific Gas & Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 96-004-00: on 960102, TS 3.3.3.5 not met when allowed
 outage time of days exceeded for component cooling water
 (CCW) pump 1-1. Caused by personnel error. Separate recurring
 task work order will be developed. W/960415 ltr.

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Pacific Gas and Electric Company

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Warren H. Fujimoto
Vice President—Diablo Canyon
Operations and Plant Manager

April 15, 1996

PG&E Letter DCL-96-073



U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Licensee Event Report 1-96-004-00
Technical Specification 3.3.3.5 Not Met Due to Personnel Error

Dear Commissioners and Staff:

Pursuant to 10 CFR 50.73(a)(2)(i)(B), PG&E is submitting the enclosed Licensee Event Report regarding Technical Specification 3.3.3.5 not being met due to personnel error.

This event did not adversely affect the health and safety of the public.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Warren H. Fujimoto'.

Warren H. Fujimoto

cc: Steven D. Bloom
L. J. Callan
Kenneth E. Perkins
Michael D. Tschiltz
Diablo Distribution
INPO

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I. Plant Conditions

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

II. Description of Problem

A. Summary:

On January 2, 1996, with Unit 1 in Mode 1 (Power Operation), at 100 percent power, Technical Specification (TS) 3.3.3.5 was not met when the allowed outage time of 30 days was exceeded for component cooling water (CCW) pump 1-1. The action time was exceeded when the verification of the capability of each control circuit and control transfer switch from the hot shutdown panel for component cooling water pump 1-1 required by surveillance test procedure (STP) P-8B, "Routine Surveillance Test of Component Cooling Water Pump" was not completed within the time limits of TS 4.3.3.5.2, including the extension allowed by TS 4.0.2.

On March 15, 1996, during a review of completed test procedures, PG&E determined that the TS 4.3.3.5.2 required 18 month surveillance should have been completed prior to December 3, 1995, and that the 30 day action requirement of TS 3.3.3.5 was exceeded on January 2, 1996. The surveillance was completed correctly on February 11, 1996.

B. Background:

TS 4.3.3.5.2 requires verification that each control circuit and control transfer switch is capable of functioning at least once every 18 months. STP P-8B performs that required test.

C. Event Description:

On January 15, 1994, STP P-8B was performed. At that time the control circuits and transfer switches from the hot shutdown panel for CCW pump 1-1 were confirmed to be operable.

On March 10, 1995, the operations department shift technical advisor (STA) responsible for preparing the STP P-8B test documentation marked the steps that verify the control circuits and transfer switches from the hot shutdown panel for the CCW pump 1-1 as not applicable.

On March 12, 1995, a second STA independently verified the STP P-8B test package, but failed to note that the steps to verify the control circuits and

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transfer switches from the hot shutdown panel for the CCW pump 1-1 were marked not applicable. The test was then performed without verifying the control circuits and transfer switches as required by TS 4.3.3.5.2. Upon completion of the test a power production engineer (PPE) performed a final review of the STP documentation. However, the PPE also failed to recognize that the test was not adequately completed.

On December 3, 1995, the TS 4.3.3.5.2 required surveillance interval including the TS 4.0.2 allowed extension was exceeded. The TS 3.3.3.5 allowed action time of 30 days was exceeded on January 2, 1996.

On February 11, 1996, STP P-8B was performed and successfully verified the operability of the control circuits and transfer switches from the hot shutdown panel for CCW pump 1-1 and the limiting condition for operation (LCO) for TS 3.3.3.5 was met.

On March 15, 1996, during a procedure review, PG&E determined that the TS 4.3.3.5.2 required 18 month verification of the capability of each control circuit and control transfer switch from the hot shutdown panel for the component cooling pump 1-1 had not been completed during its required surveillance interval.

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

None.

E. Dates and Approximate Times for Major Occurrences:

January 15, 1994:	STP P-8B was performed and included the verification of the control circuits and transfer switches from the hot shutdown panel for CCW pump 1-1.
March 12, 1995:	STP P-8B was performed without verifying the control circuits and transfer switches as required by TS 4.3.3.5.2.
December 3, 1995:	TS 4.3.3.5.2 required surveillance interval including the TS 4.0.2 allowed extension was exceeded.
January 2, 1996:	Event Date - The action statement for TS 3.3.3.5 was not met.



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February 11, 1996: STP P-8B was successfully completed and the LCO for TS 3.3.3.5. was met.

March 15, 1996: Discovery Date - PG&E determined that the LCO for TS 3.3.3.5. was not met.

F. Other Systems or Secondary Functions Affected:

None.

G. Method of Discovery:

On March 15, 1996, PG&E engineering personnel reviewing completed surveillance procedures discovered the missed surveillance. After reviewing the applicable TS, PG&E engineering determined that the missed surveillance resulted in a TS violation.

H. Operator Actions:

None

I. Safety System Responses:

None.

III. Cause of the Problem

A. Immediate Cause:

STP P-8B steps that verified the capability of each control circuit and transfer switch from the hot shutdown panel for the CCW pump 1-1 were incorrectly marked not applicable.

B. Cause:

The root cause of this event was personnel error (cognitive), inattention to detail, in that the non-licensed operations STA responsible for preparing, performing and reviewing the surveillance incorrectly marked the STP P-8B steps that verify the capability of each control circuit and transfer switch from the hot shutdown panel for the CCW pump 1-1 as not applicable.

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C. Contributory Causes:

One contributory cause of this event was personnel error (cognitive), inattention to detail, in that a second non-licensed operations STA responsible for performing the independent review failed to recognize that the STP P-8B steps that verify the capability of each control circuit and transfer switch from the hot shutdown panel for CCW pump 1-1 were incorrectly marked as not applicable.

A second contributory cause of this event was personnel error (cognitive), inattention to detail, in that the PPE performing the final review of STP P-8B failed to recognize the steps that verify the capability of each control circuit and transfer switch from the hot shutdown panel for CCW pump 1-1 were incorrectly marked as not applicable.

IV. Analysis of the Event

The control circuits and transfer switches from the hot shutdown panel for CCW pump 1-1 were tested successfully on January 12, 1994. They were again successfully tested on February 11, 1996. During the period between when the LCO for TS 3.3.3.5 was exceeded on January 2, 1996, until the February 11, 1996, test, the control circuits and transfer switches are considered to have been inoperable. The purpose for these control circuits and transfer switches is to allow a transfer of control for CCW pump 1-1 from the control room to the hot shutdown panel if the control room becomes uninhabitable due to fire. The CCW system has three pumps and is capable of performing its safety-related functions with only two pumps operable. As a result, the inoperability of pump 1-1 for this period of time did not significantly compromise safety or adversely affect the health and safety of the public. In addition, the CCW pump 1-1 was tested successfully on February 11, 1996, and there was no indication of inoperability during the period of the TS inoperability caused by the missed surveillance.

Thus, the health and safety of the public were not affected by this event.

V. Corrective Actions

A. Immediate Corrective Actions:

PG&E verified that STP P-8B was successfully completed on February 11, 1996.

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B. Corrective Actions to Prevent Recurrence:

1. A recurring task work order will be generated to ensure the verification of the capabilities of each control circuit and transfer switch to the hot shutdown panel for each of the CCW pumps is performed in accordance with the applicable STP on a minimum 18 month frequency.
2. The personnel involved in this event will be counseled on this event.

VII. Additional Information

A. Failed Components:

None.

B. Previous LERs on Similar Problems:

None.



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