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 FACIL:50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylv 05000387
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 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 88-003-01:on 880301,mis-scheduling of surveillance
 procedure results in operations prohibited by Tech Specs.
 W/8 ltr.

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 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Susquehanna Steam Electric Station - Unit One	DOCKET NUMBER (2) 0 5 0 0 0 3 8 7	PAGE (3) 1 OF 0 5
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TITLE (4)
Mis-scheduling of Surveillance Procedure Results in Operations Prohibited by Technical Specifications

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 NAMES		DOCKET NUMBER(S) -
0 3	*	* 8 8	8 8	0 0 3	0 1	1 0	1 8	8 8			0 5 0 0 0

OPERATING MODE (9) 5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)									
POWER LEVEL (10) 0 0 0	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)						
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.38(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)						
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.38(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)						
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)							
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)							
	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)							

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER	
NAME Jeffrey A. Hirt, Engineer Level II		AREA CODE 7 1 7 5	4 2 - 3 9 1 7

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
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO					

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

Following the March, 1985, completion of the Quarterly Calibration of the Source Range Monitors, Instrument and Control (I&C) personnel changed the surveillance frequency to Semi-Annually. I&C believed that an Amendment to the plant's Technical Specifications had been approved by the Commission changing the surveillance frequency from Quarterly to Semi-Annually. They were mistaken. This action resulted in the plant operating in a condition prohibited by the plant's Technical Specifications during the following time periods:

FROM	02/17/86	1130 HRS	TO	04/07/86	1155 HRS
FROM	09/22/86	0610 HRS	TO	09/23/86	2334 HRS
FROM	07/11/87	1300 HRS	TO	07/12/87	0450 HRS
FROM	09/14/87	2043 HRS	TO	10/12/87	0945 HRS

Upon discovery of the error on December 10, 1987, I&C personnel changed the frequency back to quarterly. Programatic changes were completed which require the reviewer of revised, created or deleted surveillance procedures to verify that the Commission has approved the Technical Specification changes, if they are less conservative than the previous requirements, prior to issuance of the procedure.

A review of the surveillances completed after the above time periods (i.e., in April 1986, September 1986 and October 1987) indicate that the "As Found" setpoints were within Technical Specification limits. As such, during these periods the SRM control rod block instrumentation was functional and capable of performing its design function.

** - The exact event date is unknown.

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

EVENT DESCRIPTION

Following the March, 1985 completion of the Quarterly Calibration of the Source Range Monitors, Instrument and Control (I&C) personnel changed the surveillance frequency to Semi-Annually. I&C believed that an Amendment to the plant's Technical Specifications had been approved by the Commission changing the surveillance frequency from Quarterly to Semi-Annually. They were mistaken. This action resulted in the plant occasionally operating in a condition prohibited by the plant's Technical Specifications.

On May 18, 1984, PP&L submitted to the Commission for approval Proposed Amendment No. 43. In the amendment, PP&L requested to change the surveillance frequency of the calibration for the Unit 1 Source Range Monitors (SRMs) from Quarterly to Semi-Annually. The Technical Specifications for Unit One required the calibration to be performed quarterly. The Unit Two Technical Specifications required the calibration to be performed Semi-Annually. The proposed amendment was intended to revise the Unit One Technical Specifications so that they would be similar to the Unit Two Technical Specifications.

On October 2, 1984, Compliance personnel sent a memorandum to the heads of the different plant sections (i.e., Operations, Technical, Maintenance, I&C, and Health Physics) informing them of the requested changes to the Technical Specifications. The memo requested the section heads to review the proposed changes and ensure that plant procedures existed or were revised to adequately cover the changes being requested. In accordance with plant Administrative Procedures, specific direction was given not to implement those changes which were less conservative than the present wording in the Technical Specifications because approval by the Commission was necessary.

On January 29, 1985, I&C personnel requested to change the surveillance frequency of the SRM calibration, SI-178-315A,B,C, and D, from Quarterly to Semi-Annually. I&C had mistakenly thought that the proposed amendment had been approved by the NRC. The next calibration of the SRMs was completed on March 26, 1985. After this date, the frequency was rescheduled to semi-annually per I&C's request.

On April 12, 1985, the Commission issued Amendment 36 to Unit One's operating license. This amendment incorporated some of the requests of Proposed Amendment 43; however, the specific request to change the surveillance frequency for the SRM control rod block instrumentation was not approved. The Commission stated that the Semi-Annual surveillance frequency was unacceptable. No specific reasons for why it was unacceptable were given by the Commission. (The applicable Unit Two surveillance requirement for the calibration frequency is semi-annual.)

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

On October 19, 1985, I&C personnel reviewed Approved Amendment 36 for changes affecting the plant's I&C procedures. This review failed to identify the previous error.

EVENT ANALYSIS

Technical Specification 4.3.6 requires that the control rod block instrumentation of the SRMs be calibrated quarterly. Surveillance procedure SI-178-315 performed this calibration. Since the surveillance was performed semi-annually instead of quarterly, the operability of the SRM control rod block instrumentation must be considered questionable for the last three months of the sixth month cycle. Technical Specification 3.3.6 requires three operable downscale and upscale control rod block channels per trip function while the plant is in Condition 2 (Start-up) and two operable downscale and upscale control rod block channels per trip function while the plant is in Condition 5 (Refuel).

Listed below are the completion dates since March, 1985.

SRM CHANNEL	A	B	C	D
COMPLETION	03/25/85	03/25/85	03/26/85	03/26/85
DATES	09/25/85	09/25/85	09/26/85	09/27/85
OF	04/05/86	04/07/86	04/05/86	04/07/86
SI-178-315	09/29/86	09/30/86	09/29/86	09/30/86
	03/31/87	04/06/87	04/01/87	04/08/87
	10/09/87	10/08/87	10/12/87	10/09/87
	01/07/88	01/05/88	01/08/88	01/06/88

With a surveillance frequency of quarterly, as opposed to the assumed semi-annual frequency, the completed surveillance is valid and the associated SRM control Rod Block Instrumentation is OPERABLE for only a three month period following the completion of the surveillance. Based on this logic, the following shows those periods of time when SI-178-315 was not valid.

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SRM CHANNEL	A	B	C	D
	06/25/85 TO 09/25/85	06/25/85 TO 09/25/85	06/26/85 TO 09/26/85	06/26/85 TO 09/27/85
PERIODS	12/25/85 TO 04/05/86	12/25/85 TO 04/07/86	12/26/85 TO 04/05/86	12/27/85 TO 04/07/86
DURING	07/05/86 TO 09/29/86	07/07/86 TO 09/30/86	07/05/86 TO 09/29/86	07/07/86 TO 09/30/86
WHICH	12/29/86 TO 03/31/87	12/30/86 TO 04/06/87	12/29/86 TO 04/01/87	12/30/86 TO 04/08/87
SI-178-315	06/31/87 TO 10/09/87	07/06/87 TO 10/08/87	07/01/87 TO 10/12/87	07/08/87 TO 10/09/87

Based on the above, the plant Technical Specifications require the SRM Control Rod Block instrumentation to be OPERABLE in Condition 2 and 5 per Technical Specification Table 3.3.6-1. The plant was in condition 2 or 5 with an invalid surveillance during the following intervals.

DATE	TIME	DATE	TIME	CONDITION
FROM 02/17/86	1130 HOURS	TO 04/07/86	1750 HOURS	5
FROM 09/22/86	0610 HOURS	TO 09/23/86	2334 HOURS	2
FROM 07/11/87	1300 HOURS	TO 07/12/87	0450 HOURS	2
FROM 09/14/87	2043 HOURS	TO 10/12/87	0945 HOURS	5

The Action Statement to Technical Specification 3.3.6 required that at least one inoperable channel be placed in the tripped condition within one hour. Since this was not done, the plant operated in a condition prohibited by the plant's Technical Specification for the time periods listed above.

A review of the surveillances completed after the above time periods (i.e., in April 1986, September 1986 and October 1987) indicate that the "As Found" setpoints were within Technical Specification limits. As such, during these periods the SRM control rod block instrumentation was functional and capable of performing its design function.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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TEXT (If more space is required, use additional NRC Form 368A's) (17)

It should be noted that throughout the above time periods the SRMs remained OPERABLE per the requirements of Technical Specification Section 3.3.7.6, as separate surveillance testing is performed to comply with this section of the Technical Specifications.

CAUSE OF THE EVENT/CORRECTIVE ACTION

Instrument and Control personnel mistakenly believed that the Proposed Amendment was actually an Approved Amendment.

Upon discovery of the error, I&C personnel changed the frequency of SI-178-315 to Quarterly.

Programatic controls require Compliance personnel to notify the plant section heads of impending Technical Specification changes, and of Technical Specification changes approved by the Commission. Specific direction is given that changes less conservative than the present wording in the plant's Technical specifications require Commission approval, prior to implementation. I&C personnel implemented the proposed Technical Specification changes, which were less conservative than the previous surveillance requirements, without Compliance notification. I&C personnel again revised SI-178-315 in June, 1986. This subsequent revision of the calibration procedure did not involve Technical Specification changes. As such, I&C personnel did not review the procedure against the Technical Specification Surveillance Requirements, and did not detect the error in surveillance frequency.

Actions taken to prevent recurrence included revision of the Surveillance Procedure Review Checklist. The checklist is required to be completed whenever a surveillance procedure is revised, created, or deleted. It's purpose is to assure that the requirements of the plant's Technical Specifications are implemented. The previous checklist revision did not address Technical Specification changes. The previous revision also lacked clarity in delineating when a review of the Technical Specifications was required. In the new checklist revision, if changes were incorporated, which are less conservative than the previous requirements, the preparer of the checklist is required to include the number of the Approved Amendment in which the Commission authorized the change. The revised checklist requires that the Technical Specification Surveillance Requirements are to be reviewed whenever a surveillance procedure is revised, created or deleted.

SIMILAR OCCURRENCES

A review did not identify any past similar occurrences.

REPORTABILITY

This event was determined to be reportable, on January 11, 1988, per 10CFR50.73 (a) (2) (8). In that, the Action Statement to Limiting Condition for Operation 3.3.6 was not implemented by plant personnel. This resulted in the plant operating in a condition prohibited by the Technical Specifications.



Pennsylvania Power & Light Company

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October 18, 1988

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

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 88-003-01
FILE R41-2
PLAS - 340

Docket No. 50-387
License No. NPF-14

Attached is a Licensee Event Report 88-003-01, which is an update to LER 88-003-00 filed with the Commission on February 10, 1988. This event was determined reportable per 10CFR50.73(a)(2)(i), in that, due to a mis-scheduling of a surveillance, the plant operated in a condition prohibited by the Technical Specifications.


R. G. Byram
Superintendent of Plant - Susquehanna

JAH/mjm

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