

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM
 REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8810250410 DOC.DATE: 88/10/20 NOTARIZED: NO DOCKET #
 FACIL:50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
 AUTH.NAME AUTHOR AFFILIATION
 RUSANOWSKY,P. Pennsylvania Power & Light Co.
 BYRAM,R.G. Pennsylvania Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 88-015-00:on 880919,plant operations w/surveillance requirements not performed within allowed intervals.

W/8 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 4
 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:LPDR 2 cys Transcripts.

05000388

	RECIPIENT ID CODE/NAME	COPIES LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR ENCL
	PD1-2 LA	1 1	PD1-2 PD	1 1
	THADANI,M	1 1		
INTERNAL:	ACRS MICHELSON	1 1	ACRS MOELLER	2 2
	ACRS WYLIE	1 1	AEOD/DOA	1 1
	AEOD/DSP/TPAB	1 1	ARM/DCTS/DAB	1 1
	DEDRO	1 1	NRR/DEST/ADS 7E	1 0
	NRR/DEST/CEB 8H	1 1	NRR/DEST/ESB 8D	1 1
	NRR/DEST/ICSB 7	1 1	NRR/DEST/MEB 9H	1 1
	NRR/DEST/MTB 9H	1 1	NRR/DEST/PSB 8D	1 1
	NRR/DEST/RSB 8E	1 1	NRR/DEST/SGB 8D	1 1
	NRR/DLPQ/HFB 10	1 1	NRR/DLPQ/QAB 10	1 1
	NRR/DOEA/EAB 11	1 1	NRR/DREP/RAB 10	1 1
	NRR/DREP/RPB 10	2 2	NRR/DRIS/SIB 9A	1 1
	NUDOCS-ABSTRACT	1 1	REG FILE 02	1 1
	RES/DSIR/EIB	1 1	RES/DSR DEPY	1 1
	RES/DSR/PRAB	1 1	RGNI FILE 01	1 1
EXTERNAL:	EG&G WILLIAMS,S	4 4	FORD BLDG HOY,A	1 1
	H ST LOBBY WARD	1 1	LPDR	2 2
	NRC PDR	1 1	NSIC HARRIS,J	1 1
	NSIC MAYS,G	1 1		
NOTES:		2 2		

[Handwritten Signature]
A/O 4

TOTAL NUMBER OF COPIES REQUIRED: LTR 46 ENCL 45

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Susquehanna Steam Electric Station - Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 3 8 8	PAGE (3) 1 OF 0 3
--	--------------------------------------	----------------------

TITLE (4) Plant Operations With Surveillance Requirements Not Performed Within their Allowed Intervals

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 9	1 9	8 8	8 8	0 1 5	0 0	1 0	2 0	8 8			0 5 0 0 0
											0 5 0 0 0

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

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER	
NAME Pete Rusanowsky - Power Production Engineer		AREA CODE 7 1 7	5 4 2 - 3 7 5 9

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 checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input type="checkbox"/> NO		0 1	3 1	8 9

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

While lined up to the Off-Gas System Common Hydrogen Recombiner, Unit 2 was operated at power from 1840 on September 17, 1988 to 1300 on September 19, 1988 with the Recombiner's Hydrogen Analyzers technically inoperable. This was caused by insufficient procedural requirements for documentation and system status control which resulted in the Hydrogen Analyzers being declared operable with required surveillances not being performed within their allowed intervals per the plant's Technical Specifications Surveillance Requirements Section 4.0.3. When the situation was discovered by site I&C personnel and reported to Operations, the applicable Limiting Condition for Operation (LCO) was entered at 1300 on September 19th and the required surveillance activities were commenced. The surveillances were completed on September 23rd and the LCO was cleared. The administrative procedure for the plant's surveillance testing program is being revised to establish necessary control to prevent recurrence. The safety assessment of this event and the determination of previous similar events is under investigation and will be reported in a supplement to this LER.

BB10250410 BB1020
 PDR ADDCK 05000388
 S PNU

IE22
 Y1

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Unit 2 Susquehanna Steam Electric Station	DOCKET NUMBER (2) 0 5 0 0 0 3 8 8	LER NUMBER (6)			PAGE (3)		
		YEAR 8 8	SEQUENTIAL NUMBER - 0 1 5	REVISION NUMBER - 0 1 0			
					0 2	OF 0 3	

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

DESCRIPTION OF EVENT

While lined up to the Off-Gas System (EISS Code: WF) Common Hydrogen Recombiner, Unit 2 was operated at power from 1840 on September 17, 1988 to 1300 on September 19, 1988 with the Recombiner's Hydrogen Analyzers (AIT-06973A/B) technically inoperable which is in violation of Technical Specification Limiting Condition for Operation (LCO) 3.3.7.11. This was a result of not performing surveillance requirements within their allowed surveillance intervals per the plant's Technical Specifications Surveillance Requirements Section 4.0.3. During this period of time, Unit 2 thermal power was varied between 80% and 100%.

At 1710 on September 16, 1988, the high hydrogen concentration isolation trip signals from the Common Recombiner Hydrogen Analyzers were defeated and LCO 3.3.7.11 was entered per standard plant operating procedures in preparation for putting the Common Recombiner in service. At 1830 on September 16th the Common Recombiner was placed in service and the Unit 2 Recombiner was placed in standby. After the hydrogen concentration indications had stabilized, the high hydrogen concentration isolation trip signals were placed back in service, the hydrogen analyzers were declared operable, and LCO 3.3.7.11 was cleared at 1840 on September 17th. At this time Operations wasn't aware of the fact that I&C had declared the Hydrogen Analyzer surveillances Out-of-Service/Out-of-Mode (OS/OM) prior to September 16th when the Common Recombiner was not in service and that these surveillances were required to be performed in order to declare the Hydrogen Analyzers operable. OS/OM is an administrative mechanism used in the surveillance tracking system to save the Grace Period associated with surveillances. It is based on the fact that surveillances need not be performed on equipment that is not in service and not required to be operable at the time. On September 19th, I&C became aware of the situation, notified Operations, and LCO 3.3.7.11 was re-entered at 1300 on September 19th.

CAUSE OF THE EVENT

The cause of this event has been attributed to insufficient procedural requirements for documentation and status control of OS/OM surveillance activities.

REPORTABILITY/ANALYSIS

It has been determined that this event is reportable per 10CFR50.73(a)(2)(i)(B) in that Unit 2 had been operated in violation of LCO 3.3.7.11 and hence in a condition prohibited by the plant's Technical Specifications. This was a result of not performing Surveillance requirements within their allowed surveillance intervals per the plant's Technical Specifications Surveillance Requirements Section 4.0.3. The safety assessment associated with this event is under investigation and will be reported in a supplement to this LER.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Unit 2 Susquehanna Steam Electric Station	DOCKET NUMBER (2) 0 5 0 0 0 3 8 8	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 8	- 0 1 5	- 0 0	0 3	OF	0 3

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

CORRECTIVE ACTIONS

When Operations was informed of the situation, LCO 3.3.7.11 was re-entered and manual hydrogen sampling and analysis was commenced in accordance with the LCO Action Statement. The required surveillance activities on the Hydrogen Analyzers were commenced on September 19th, completed on September 23rd, and LCO 3.3.7.11 was subsequently cleared. Plant administrative procedure, AD-QA-422, Surveillance Testing Program, is being revised to establish a means of status control for systems when surveillance activities are declared OS/OM. This procedure will require a formal plant document be placed in the System Status File, which is used by Operations to determine system operability, when a surveillance activity is declared OS/OM. Any additional surveillance activities declared OS/OM for the same system may be annotated on the same document.

ADDITIONAL INFORMATION

Failed Component Identification: Not applicable.

Previous Similar Events: This investigation is in progress and will be reported in a supplement to this LER.



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215/770-5151

October 20, 1988

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

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 88-015-00
FILE R41-2
PLAS - 342

Docket No. 50-388
License No. NPF-22

Attached is Licensee Event Report 88-015-00. This event was determined to be reportable per 10CFR50.73(a)(2)(i)(B) in that surveillance requirements were not performed within their allowed surveillance intervals per the plant's Technical Specifications Surveillance Requirements Section 4.0.3. This resulted in Unit 2 being operated in a condition prohibited by the plant's Technical Specifications.

R.G. Byram for
R.G. Byram
Superintendent of Plant - Susquehanna

PPR/mjm

cc: Mr. William T. Russell
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Frank Young
Sr. Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 52
Shickshinny, PA 18655

*TER22
11*

