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

SUBJECT: LER 89-013-00: on 890503, surveillance requirements not performed within allowable intervals.

W/8 ltr.

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 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES: LPDR 1 cy Transcripts.

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Pennsylvania Power & Light Company

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June 2, 1989

U.S. Nuclear Regulatory Commission
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SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 89-013-00
FILE R41-2
PLAS -367

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

Attached is Licensee Event Report 89-013-00. 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 1 and 2 being operated in a condition prohibited by the plant's Technical Specifications.



R.G. Byram
Superintendent of Plant - Susquehanna

TSR/mjm

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Susquehanna Steam Electric Station - Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 3 8 7	PAGE (3) 1 OF 0 3
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TITLE (4)
Surveillance Requirements Not Performed Within 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	5	03	89	013	00	06	02	89	SSES-U-2	0 5 0 0 0 3 8 8
0	5	03	89	013	00	06	02	89		0 5 0 0 0

OPERATING MODE (9) 5

POWER LEVEL (10) 0 | 0 | 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

20.402(b)	20.406(c)	50.73(a)(2)(iv)	73.71(b)
20.406(a)(1)(i)	50.38(c)(1)	50.73(a)(2)(v)	73.71(c)
20.406(a)(1)(ii)	50.38(c)(2)	50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
20.406(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
20.406(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Thomas S. Ryder - Power Production Engineer	7 1 7 5 4 2 1 - 3 2 3 5

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

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

On May 3, 1989 it was discovered that during Unit 1 fuel offload for the Unit's 4th refueling outage, Technical Specification 3.3.2.c was violated in that a portion of Action 25 from Table 3.3.2-1, Trip function 2.a was not performed within the required time. The portion of the surveillance needed for fuel movement tests the reactor vessel water level secondary containment isolation function. On May 3, 1989 it was identified that the surveillance was required to have been current for fuel offload. A thorough investigation of this event revealed that a similar condition existed on three other occasions. The cause of this event was attributed to a combination of procedural error and human error. The event has been determined to be reportable per 10CFR50.73(a)(2)(i)(B), in that Unit 1 and 2 had been operated in a condition prohibited by Technical Specification 3.3.2.c. The secondary containment logic function performed by the level switches was not degraded during the periods of time the surveillances were not current. Procedural changes will be made to SI-180-206 and SI-280-206 to ensure that these surveillances reflect the correct applicable plant conditions as per Technical Specifications. A review of a sample of similar, complex multi-function switch surveillances will also be performed. The event has been reviewed with the I&C personnel personnel involved.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Unit 1 Susquehanna Steam Electric Station	DOCKET NUMBER (2) 0 5 0 0 0 3 8 7 8 9	LER NUMBER (6)				PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER				
		0	13	0	0	0	2 OF 0 3	

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

DESCRIPTION OF EVENT

On April 2, 1989 with Unit 1 in Condition 5, Surveillance SI-180-206 (Monthly Functional Test of Reactor Vessel Water Level Low Low Level 2 Channels LITS-B21-1N026A,B,C,D) was placed in a status in which the surveillance testing would temporarily not be performed. Allowance is provided in Technical Specification 4.0.3 for not performing surveillance requirements on inoperable equipment. Functions tested in the procedure were not required to be operable at this time. Technical Specification Table 3.3.2-1, Trip Function 2.a requires that the instruments surveilled by SI-180-206 be operable in Conditions 1,2,3 and * for the secondary containment isolation (EIIS Code: VA) function (* refers to when handling irradiated fuel in the secondary containment and during core alterations and operations with a potential for draining the reactor vessel). On April 7, 1989 Condition * was entered on Unit 1 when fuel offload commenced. On April 9, 1989 the specified time interval for SI-180-206 was exceeded and therefore at that time Technical Specification 3.3.2.c was violated in that a portion of Action 25 from Table 3.3.2-1, Trip Function 2.a was not performed within the required time interval. On May 3, 1989 during a review of surveillances that would be required to be current for commencing fuel reload, it was identified that SI-180-206 was applicable. It was also realized that SI-180-206 was required to have been current for the fuel offload evolution and consequently, that Technical Specifications had been violated. During the event investigation, it was noted that Technical Specification 3.3.2.c had been violated on two other occasions in 1987 during Unit 1's third refuel outage (once during fuel offload and once during fuel reload). The review also identified that a similar Technical Specification violation had taken place on Unit 2 once during its second refuel outage in 1988 when SI-280-206 was placed in a non-testing status. Functions tested in the procedure other than the secondary containment logic function were not required to be operable at this time.

CAUSE OF EVENT

The cause of this event was attributed to a combination of procedural error and human error. The procedural error consisted of SI-180-206 and SI-280-206 identifying their Technical Specification applicability for Conditions 1,2, and 3 rather than 1,2,3 and * as is stated in Technical Specifications. The procedure tests multiple functions for the LITS-B21-N026 level switches. Only the secondary containment logic function is required for Condition *. It is believed that this factor led to the procedural error.

The human error was attributed to a failure by I&C personnel to check the Applicable Operational Condition in Table 3.3.2-1 of the Technical Specification for this Trip Function when a question arose during the review of surveillances required to be current for entry into condition *.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Unit 1 Susquehanna Steam Electric Station	DOCKET NUMBER (2) 0 5 0 0 0 3 8 7	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 9	0 1 3	0 0	0 3	OF	0 3

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

REPORTABILITY/ANALYSIS

The event has been determined to be reportable per 10CFR50.73(a)(2)(i)(B), in that Unit 1 and 2 had been operated in a condition prohibited by Technical Specification 3.3.2.c. This was a result of not performing surveillance requirements within their allowed surveillance intervals per the plants' Technical Specifications Surveillance Requirements, Section 4.0.3. There was no safety consequences from this event since the secondary containment isolation function performed by LITS-B21-N026 level switches was not degraded during the periods of time the surveillances were not maintained current. A review of the surveillances completed immediately following the unsurveilled time periods verified that the pertinent switches were functional during each period.

CORRECTIVE ACTIONS

SI-180-206 was satisfactorily performed on May 3, 1989 as an immediate corrective action. Procedural changes will be made to SI-180-206 and SI-280-206 to ensure that these surveillances reflect the correct applicable plant conditions as per Technical Specifications. Review of a sample of similar, complex multi-function switch surveillances will also be performed to ensure that the Applicable Operational Condition for each trip function is accurate. The event has been reviewed with the I&C personnel involved.

ADDITIONAL INFORMATION

Failed Component Identification: Not applicable.

Previous Similar Events: Not Applicable.