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ACCESSION NBR: 9001080253 DOC. DATE: 89/12/29 NOTARIZED: NO DOCKET #
 FACIL: 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
 AUTH. NAME AUTHOR AFFILIATION
 RUSANOWSKY, P.P. Pennsylvania Power & Light Co.
 BYRAM, R.G. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 88-015-01: on 880919, plant operations with surveillance requirements not performed within their allowed intervals.
W/8 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES: LPDR 1 cy Transcripts. 05000388

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December 29, 1989

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

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 88-015-01
FILE R41-2
PIAS - 401

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

Attached is supplemental Licensee Event Report 88-015-01. This supplement is being issued to provide additional details concerning the event, a safety assessment of the event, and the results of a review of past similar events. This event was determined to be reportable per 10CFR50.73(a)(2)(i)(B) in that surveillance activities were not performed within their specified 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
Superintendent of Plant - Susquehanna

PPR/mjm

cc: Mr. W.T. Russell
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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) **Susquehanna Steam Electric Station - Unit 2** DOCKET NUMBER (2) **05000388** PAGE (3) **1 OF 03**

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	1988	88	015	01	2	29	89		050000

OPERATING MODE (8) **1**

POWER LEVEL (10) **100**

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

<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(e)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
<input type="checkbox"/> 20.406(a)(1)(i)	<input type="checkbox"/> 50.36(e)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 50.36(e)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 365A)
<input type="checkbox"/> 20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(vii)(A)	
<input type="checkbox"/> 20.406(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
<input type="checkbox"/> 20.406(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME **P.P. Rusanowsky - Power Production Engineer - Compliance** TELEPHONE NUMBER **717 542-3759**

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	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)

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 procedurally 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 specified 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 (LO) was entered at 1300 on September 19th and the required surveillance activities were commenced. Hydrogen Analyzer Channel B surveillances were completed at 1650 on September 21st and the LO, which only requires one operable channel, was cleared. A suspected problem with Channel A was resolved and its surveillances subsequently completed at 1450 on September 23rd. The administrative procedure for the plant's surveillance testing program has been revised to reinforce the procedural mechanisms used for system status control. Based on a review of all pertinent data, it was concluded that both channels, although procedurally inoperable, were capable of performing their intended safety functions during the event being reported and hence there was no compromise to the health or safety of the public.



LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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 1	0 2	OF	0 3

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

DESCRIPTION OF EVENT

While lined up to the Off-Gas System (EIIS 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) procedurally 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 activities within their specified 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, the Unit 2 Recombiner was placed in standby and manual hydrogen sampling and analysis was commenced. 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 or not required to be operable per the plant's Technical Specifications. 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 surveillance activities declared OS/OM for equipment not in service.

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 activities within their specified intervals per the plant's Technical Specifications Surveillance Requirements Section 4.0.3. Although the Common Recombiner Hydrogen Analyzers were

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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

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

procedurally inoperable, based on a review of the surveillances and associated work activities completed subsequent to the event, it has been concluded that both channels were, in fact, functioning properly during the event being reported. Hence, there was no compromise to the health or safety of the public.

CORRECTIVE ACTIONS

When Operations was informed of the situation, LCO 3.3.7.11 was re-entered, manual hydrogen sampling and analysis was reinitiated in accordance with the LCO Action Statement, and the required surveillance activities were commenced. The Channel B surveillances were completed satisfactorily at 1650 on September 21st and LCO 3.3.7.11, which only requires one operable channel, was cleared. A suspected problem with Channel A was resolved and its surveillances subsequently completed at 1450 on September 23rd. Plant administrative procedure, AD-QA-422, Surveillance Testing Program, has been revised to reinforce the procedural mechanisms used to maintain system status control when surveillance activities are declared OS/OM for equipment not in service.

ADDITIONAL INFORMATION

Failed Component Identification: Not applicable.
Previous Similar Events: LER 86-014-01