

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9003070108      DOC. DATE: 90/03/02      NOTARIZED: NO      DOCKET #  
 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylv      05000387  
 AUTH. NAME      AUTHOR AFFILIATION  
 LLOYD, H.      Pennsylvania Power & Light Co.  
 STANLEY, H.G.      Pennsylvania Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION

SUBJECT: LER 90-008-00: on 900220, required instrumentation surveillances not performed.

W/8      ltr.

DISTRIBUTION CODE: IE22T      COPIES RECEIVED: LTR 1 ENCL 1      SIZE: 5  
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES: LPDR 1 cy Transcripts. 05000387

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	NRR/DST/SICB 7E	1	1		NRR/DST/SPLB8D1	1	1	
	NRR/DST/SRXB 8E	1	1		<del>REG-FILE</del> 02	1	1	
	RES/DSIR/EIB	1	1		RGN1 FILE 01	1	1	
EXTERNAL:	EG&G WILLIAMS, S	4	4		L ST LOBBY WARD	1	1	
	LPDR	1	1		NRC PDR	1	1	
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Pennsylvania Power & Light Company

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March 2, 1990

U.S. Nuclear Regulatory Commission  
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SUSQUEHANNA STEAM ELECTRIC STATION  
LICENSEE EVENT REPORT 90-008-00  
FILE R41-2  
PLAS -411

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

Attached is Licensee Event Report 90-008-00. This report is being made pursuant to 10CFR50.73(a)(2)(i)(B), in that Susquehanna Units 1 and 2 were operated in a condition prohibited by the Technical Specifications due to instrumentation not being tested per the surveillance requirements. This condition has been corrected by appropriate testing and procedure initiation.

H.G. Stanley  
Superintendent of Plant - Susquehanna

HL/mjm

cc: Mr. W. T. Russell  
Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
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Mr. G. S. Barber  
Sr. Resident Inspector  
U.S. Nuclear Regulatory Commission  
P.O. Box 35  
Berwick, PA 18603-0035



LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 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 1										DOCKET NUMBER (2) 0   5   0   0   0   3   8   7   1			PAGE (3) 1 OF 0   4	
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TITLE (4)  
Required Instrumentation Surveillances Not Performed

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	2	2	0	9	0	9	0	0	0	8	0	0	0	3	0	2	9	0	SSES - Unit 2		0   5   0   0   0   3   8   8
												0   5   0   0   0									

OPERATING MODE (9) 4		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	20.402(b)			20.406(c)			50.73(a)(2)(iv)			73.71(b)		
	20.406(a)(1)(i)			50.73(a)(1)			50.73(a)(2)(v)			73.71(c)		
	20.406(a)(1)(ii)			50.73(a)(2)			50.73(a)(2)(vii)			OTHER (Specify in Abstract below and in Text, NRC Form 366A)		
	20.406(a)(1)(iii)			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)(ix)					

LICENSEE CONTACT FOR THIS LER (12)									
NAME H. Lloyd, Jr. - Power Production Engineer							TELEPHONE NUMBER		
							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 NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

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)

At 1100 hours on February 2, 1990 it was determined that Unit 1 and Unit 2 had failed to meet a Technical Specification action statement due to a surveillance requirement not being included in plant procedures for one range of Post Accident Monitoring Instrumentation (PAM); (i.e. - Primary Containment High Range Pressure). The appropriate limiting condition for operation was entered and steps were immediately initiated to calibrate the instruments and prepare formal surveillance procedures. Once calibrations were complete and reviewed by plant management, the Limiting Conditions were cleared. This event has been determined to be reportable per 10CFR50.72(a)(2)(i)(B), in that failure to meet the action statement of the Plant Technical Specification constituted operation prohibited by the Technical Specifications. All other PAM instrumentation was reviewed to ensure no other surveillance requirement discrepancies existed. The cause of this condition appears to be an oversight that occurred in 1985 following the addition of these instruments to the plant. A review of our Administrative programs was performed and we had concluded that present plant programs ensure necessary reviews to prevent similar occurrences.

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-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 1 Susquehanna Steam Electric Station	DOCKET NUMBER (2)  0 5 0 0 0 3 8 7	LER NUMBER (8)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 0	0 0 8	0 0	0 2	OF	0 4

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

DESCRIPTION OF EVENT

At 1100 hours on February 2, 1990, with Unit 1 operating in Condition 4 at 0% power and Unit 2 operating in Condition 1 at 100% power, it was determined that the Containment High Range pressure instruments (Post Accident Monitoring Instrumentation (PAM) - EIIS Code: IP) were not included in surveillance procedures, thus the requirements of Technical Specification 4.3.7.5 (item 6 - Primary Containment Pressure) were not met. These instruments were declared inoperable and the appropriate Limiting Conditions for Operation were entered. These instruments are one of two ranges which monitor primary containment pressure. The LOCA range instruments are 0-65 psia and are included in the surveillance program. The High range instruments are 0-250 psig and were found not to be in the Surveillance program. This was discovered during a review of selected, previously completed Surveillance Procedures which test PAM instruments.

CAUSE OF EVENT

The apparent cause of the event was the fact that procedure development for the surveillance program was essentially complete when these primary containment high range instruments were added to the plant design (November, 1982) by the Architect Engineer via a design change package. The subject instruments were calibrated by utility personnel (non-licensed) following installation but were not identified at that time as requiring surveillance.

During this time frame a task force was created to perform a complete review of the Technical Specification surveillance requirements. This review was completed, the program was formalized and a surveillance program coordinator assigned to assure continued review and update as necessary.

In addition, during the task force review, an in house Engineering document (Engineering Work Request) was generated on June 29, 1984 to identify all Post Accident Monitoring Instruments (PAM) for purposes of developing required surveillance procedures. This document was requested since a portion of the PAM instruments were installed via the above mentioned design change package and drawings/design documents were in the process of being updated. Instrumentation, monitoring both ranges (High and LOCA) of Primary Containment pressure were listed on this document but only the LOCA range was ultimately included in the surveillance program. The procedures for surveillance of the LOCA range were already in existence when the PAM list was received by the task force and upon review/incorporation of these instruments into the program, the high range was apparently over-looked. This event is considered an isolated incident.

LICENSEE EVENT REPORT (LER)  
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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

REPORTABILITY/ANALYSIS

This event was determined to be reportable per 10CFR50.73(a)(2)(i)(B), in that failure to meet the action statement of Technical Specification 3.3.7.5 constituted operation prohibited by the Technical Specification.

This event did not create a significant degradation in our ability to protect the health and safety of the public and/or plant personnel, since only the high range of primary containment pressure indication was not tested per surveillance requirement 4.3.7.5 of the Technical specification. This instrumentation provides no safety system initiation or isolation function but provides high range post accident monitoring function only. When the instruments were calibrated on February 2, 1990 they were all found to be in calibration and thus would have provided accurate indication in the event of an accident. Also, the LOCA range instruments (0-65 psia) were operable and available for containment pressure monitoring since initial plant operations. The safety impact of this event would not have been greater at any other plant operating condition.

In accordance with the guidance provided in NUREG 1022 Supplement 1, items 14.1 and 14.10, the required submission date for this report was determined to be March 5, 1990.

CORRECTIVE ACTIONS

The subject instruments (Primary Containment High Range Pressure Transmitters) for Unit 1 and Unit 2 were immediately calibrated via approved work documents. Procedures were initiated and placed into the surveillance scheduling system. All as found data was within specified tolerance for these instruments.

The Engineering Work Request identifying Post Accident Monitoring Instrumentation was reviewed to verify all other identified instrumentation was in compliance with the Technical Specifications.

A review of our administrative programs was performed to determine if changes were warranted as a result of this event. We found that our administrative programs presently in place (i.e. Plant Modification Program and Surveillance Testing Program) provide the necessary mechanism to ensure Technical Specification Surveillance requirements are met. The Surveillance Program includes proper reviews are performed when any changes to the plant design or Technical Specifications are implemented. The Plant Modification Program includes reviews by any affected work groups to ensure necessary procedure changes are initiated resulting from plant modifications. In addition, on-going reviews of Surveillance Procedures, drawings, and Surveillance

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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

Authorizations are performed by the Surveillance Program Coordinator as an added measure. This event appears to be an isolated occurrence that resulted from an oversight in 1984.

ADDITIONAL INFORMATION

Failed Component Identification: Not applicable

Previous Similar Report Events:

Docket No. 50-387: LER 83-002 MSIV Closure Position Switches surveillance not performed.

Docket No. 50-387: LER 83-083 Functional Channel Checks of SPINGS not performed properly (inadequate procedures).

Docket No. 50-387: LER 85-027 Offgas Pretreatment Radiation Monitor 18 Month Calibration not performed.