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ACCESSION NBR: 9012060012 DOC. DATE: 90/11/28 NOTARIZED: NO DOCKET #
 FACIL: 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
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 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 90-012-00: on 900614, surveillances not completed within allowable time following operational condition changes.

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.

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Pennsylvania Power & Light Company

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November 28, 1990

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

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 90-012-00
FILE R41-2.
PLAS - 454

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

Attached is Licensee Event Report 90-012-00. This report is being made pursuant to 10CFR50.73(a)(2)(i) in that a condition prohibited by Technical Specifications existed when turbine overspeed protection valve cycling surveillances were not completed within the allowable time following operational condition changes.

H.G. Stanley
Superintendent of Plant - Susquehanna

TSR/mjm

cc: Mr. T.T. Martin
Regional Administrator, Region I
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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)
0 5 | 0 | 0 | 0 | 3 | 8 | 8

PAGE (3)
1 OF 0 | 3

TITLE (4)
Surveillances Not Completed Within Allowable Time Following Operational Condition Changes

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	6	1	4	9	0	9	0	0	0	1	2	0	0	1	1	2	8	9	0	SSES - Unit 1	0 5 0 0 0 3 8 7

OPERATING MODE (9)
1

POWER LEVEL (10)
0 | 1 | 4

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

LICENSEE CONTACT FOR THIS LER (12)

NAME
T.S. Ryder - Power Production Engineer

TELEPHONE NUMBER
AREA CODE: **7 1 | 7** NUMBER: **5 4 | 2 | 3 | 2 | 3 | 5**

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

CAUSE	SYSTEM	COMPONENT	MANUFAC. TURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFAC. TURER	REPORTABLE TO NPRDS

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 two occasions during unit startup, the twenty-four hour allowable time period from entry into OPERATIONAL CONDITION 2 until turbine overspeed protection testing was completed was exceeded. This represented a condition prohibited by Technical Specifications, and as such, was reportable in accordance with 10CFR50.73(a)(2)(i)(B). This finding was identified during an internal Quality Assurance audit being performed on Susquehanna's Surveillance Test Program. There were no safety consequences or compromise to the public health or safety as a result of this event. The surveillances, when later performed, were successfully completed demonstrating OPERABILITY of the turbine overspeed protection systems for each unit. The cause of this event was due to the failure to recognize that completion of turbine overspeed protection testing had been indirectly constrained by a twenty-four hour time limit provided in Bases Section 4.0.3. As an interim measure, turbine valve cycling testing will be performed in CONDITION 4 during plant startups subsequent to this event. Since continual performance of this testing in this condition may be detrimental to the turbine valves a Technical Specification change request will be submitted to revise the applicability for testing the turbine overspeed protection system to when the turbine is in service.

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 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			
		9 0	- 0 1 2	- 0 0	0 2	OF	0 3

TEXT (If more space is required, use additional NRC Form 306A's) (17)

DESCRIPTION OF EVENT

On two occasions during unit startup (June 13 - 14, 1990 on Unit 2 and June 15 - 17, 1990 on Unit 1), the period of time from entry into OPERATIONAL CONDITION 2 until turbine (EIIIS Code: TA) overspeed protection testing was completed exceeded twenty-four hours. Unit 2 entered CONDITION 2 on June 13, 1990 at 0625 hours and turbine overspeed protection testing was completed on June 14, 1990 at 1000 hours. Unit 1 entered CONDITION 2 on June 15, 1990 at 2250 hours and turbine overspeed protection testing was completed on June 17, 1990 at 1100 hours. This finding was identified in the course of an internal Quality Assurance audit being performed on Susquehanna's Surveillance Test Program. Upon evaluation of the finding, plant staff made the determination on October 29, 1990 that this represented a condition prohibited by Technical Specifications, and as such, was reportable in accordance with 10CFR50.73(a)(2)(1)(B).

CAUSE OF EVENT

During unit startup, the change to CONDITION 2 takes place when the reactor is subcritical. The main turbine is placed in service when reactor power is at approximately 15%. Performance of turbine overspeed protection testing is not typically performed until the turbine is placed in service. Depending on startup activities, the time between entry into CONDITION 2 and placing the turbine in service can take longer than twenty-four hours.

Technical Specification 3.3.8 requires that the turbine overspeed protection system shall be OPERABLE in CONDITIONS 1 and 2. Technical Specification 4.3.8.1 states that the provisions of Specification 4.0.4, which prohibits entry into an OPERATIONAL CONDITION unless the Surveillance Requirements applicable to that condition have been completed, are not applicable.

On April 4, 1988 Generic Letter 87-09 was incorporated into plant Technical Specifications via Amendment 43 for Unit 2 and Amendment 78 for Unit 1. Part of these Amendments added words to the Bases for Specification 4.0.3 which impacted the Bases of Specification 4.0.4. As a result of the Amendments, Bases Section 4.0.3 now imposes a twenty-four hour time limit for the completion of applicable Surveillance Requirements when an exception to the requirements of Specification 4.0.4 is allowed. The cause of this event was due to the failure of recognizing that the completion of turbine overspeed protection testing had been indirectly constrained by a twenty-four hour time limit provided in Bases Section 4.0.3.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 600 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			
		9 0	0 1 2	0 0	0 3	OF	0 3

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

REPORTABILITY/ANALYSIS

This event was determined reportable per 10CFR50.73(a)(2)(i)(B) in that the turbine overspeed protection systems for Unit 1 and 2 were not demonstrated as OPERABLE either prior to or within twenty-four hours of entering OPERATIONAL CONDITION 2. Per Technical Specification Bases 4.0.3, this represented a condition prohibited by the plant's Technical Specifications. There were no safety consequences or compromise to the public health or safety as a result of this event. The twenty-four hour time allowance was exceeded by four hours and 35 minutes on Unit 2 and by 12½ hours on Unit 1. The surveillances, when performed, were successfully completed demonstrating OPERABILITY of the turbine overspeed protection systems for each unit.

In accordance with the guidance provided in NUREG 1022 Supplement 1 Item 14.1, the required submission date for this report was determined to be November 28, 1990.

CORRECTIVE ACTIONS

As an interim measure, a procedural change and work plans were issued to allow performance of turbine valve cycling testing for Unit 1 in CONDITION 4. The revised testing methodology was accomplished on Unit 1 on November 9 and 13, 1990 following the unit's fifth refueling outage. A similar approach will be initiated for Unit 2, if necessary before a final solution can be implemented. Performing turbine valve testing in CONDITION 4 without available steam pressure to mitigate the mechanical shock to the turbine valves upon closure is undesirable because of possible valve degradation that could be incurred. The preferred long term solution is to test the turbine overspeed protection system only when the turbine is in service. Therefore, a Technical Specification change request will be submitted to require demonstration of the OPERABILITY of the turbine overspeed protection system within twelve hours of placing the turbine in service and to change the Applicability statement to recognize that the weekly valve cycling testing is only necessary when the turbine is in service.

ADDITIONAL INFORMATION

Failed Component Identification: Not applicable

Previous Similar Events:

There were no previous similar events identified involving Surveillance Requirements not completed within the allowable twenty-four hour time limit after OPERATIONAL CONDITION changes when an exception to the requirements of Specification 4.0.4 is allowed.