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ACCESSION NBR: 9101020319      DOC. DATE: 90/12/21      NOTARIZED: NO      DOCKET #  
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 AUTH. NAME      AUTHOR AFFILIATION  
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 STANLEY, H.G.      Pennsylvania Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION

SUBJECT: LER 90-030-00: on 901202 & 15, Condition 2 entered w/o performing surveillances of APRMs & source-range monitors, per Generic Ltr 87-09. Caused by failure to identify Tech Spec exemptions. Tech Spec change requested. W/901221 ltr.

DISTRIBUTION CODE: IE22T      COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6  
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES: LPDR 1 cy Transcripts. 05000387

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Pennsylvania Power & Light Company

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December 21, 1990

U.S. Nuclear Regulatory Commission  
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SUSQUEHANNA STEAM ELECTRIC STATION  
LICENSEE EVENT REPORT 90-030-00  
FILE R41-2  
PLAS -465

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

Attached is Licensee Event Report 90-030-00. These events were determined reportable per 10CFR50.73(a)(2)(i)(B) in that entries were made into an Operational Condition on Unit 1 and Unit 2 prior to having completed all Surveillance Requirements necessary for that Operational Condition per Technical Specification sections 3.0.4 and 4.0.4.

  
H.G. Stanley  
Superintendent of Plant - Susquehanna

RRW/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 1		DOCKET NUMBER (2) 0 5 0 0 0 3 18 17	PAGE (3) 1 OF 0 15
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TITLE (4)  
Entries Into Condition 2 Without Completed Surveillances on Unit 1 and Unit 2

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)								
1	2	0	2	9	0	0	9	0	0	3	0	0	0	0	3	18	18		
1	2	0	2	9	0	0	1	2	SSES - Unit 2		0	5	0	0	0	0	3	18	18

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

LICENSEE CONTACT FOR THIS LER (12)	
NAME Richard R. Wehry - Compliance Evaluator	TELEPHONE NUMBER 7 1 1 7 5 1 4 2 1 - 1 3 1 6 1 4

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
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

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

On December 2, 1990 and December 15, 1990 planned shutdowns were performed for Unit 1 and Unit 2, respectively, to conduct certain equipment repairs. Prior to these shutdowns, an internal work group review had identified that the IRMs, APRMs and SRMs could not be surveillance tested until AFTER entry into Condition 2 or 3 from Condition 1 and no exceptions for these instruments from the requirements of Technical Specification sections 3.0.4 and 4.0.4 currently existed in the Technical Specifications. A request for Temporary Waiver of Compliance from these requirements had been submitted to the NRC but was denied by the NRC by letter dated 11/30/90 since the request did not meet the requirements of 10CFR50.91 for emergency or exigency changes to the Tech Specs. Entry into the Tech Spec LCO Action statements for these instruments results in half scrams and rod blocks that unnecessarily increase the potential of a scram or otherwise restrict unit operation. Therefore, in lieu of entering the LCO Action statements, PP&L is reporting the entries into Condition 2 or Condition 3 from Condition 1 with incomplete surveillances pursuant to 10CFR50.73(a)(2)(i)(B). The subject surveillances were successfully completed shortly after entry into Condition 2 for the Unit 1 shutdown and after entry into Condition 3 for the Unit 2 shutdown. PP&L has applied for a permanent change to the Technical Specifications for the subject instrumentation. The NRC has agreed to process this amendment in an expeditious manner. There were no safety consequences or compromise to public health or safety as a result of these events.

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 (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

BACKGROUND

The Susquehanna SES Technical Specifications were modified in April 1988 in accordance with Generic Letter 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on Applicability of Limiting Conditions for Operation (LCO) and Surveillance Requirements". One of the problems specifically addressed by the letter was possible conflicts between Specifications 4.0.3 and 4.0.4, which would require additional approved Technical Specification amendments for any exceptions to Specification 4.0.4.

PP&L recently identified that the Intermediate Range Monitors (IRMs; EIIS Code: IG), Source Range Monitors (SRMs; EIIS Code: IG) and the neutron flux - upscale, setdown and startup functions of the Average Power Range Monitors (APRMs; EIIS Code: IG) cannot be tested until AFTER entry into Operational Condition 2 or 3 from Operational Condition 1 (due to reactor mode switch interlocks and the fact that IRMs and SRMs cannot remain in the core when the reactor is in Condition 1), and no exceptions to the requirements of Technical Specifications 3.0.4 and/or 4.0.4 currently exist.

DESCRIPTION OF EVENT

On December 2, 1990 and December 15, 1990 planned shutdowns were performed for Unit 1 and Unit 2, respectively, to conduct certain equipment repairs. Prior to these shutdowns, an internal work group review had identified that the IRMs, SRMs and APRMs could not be tested until AFTER entry into Condition 2 or 3 from Condition 1 (due to reactor mode switch interlocks and the fact that IRMs and SRMs cannot remain in the core when the reactor is in Condition 1) and no exceptions for these instruments from Technical Specification sections 3.0.4 and 4.0.4 currently existed in the Technical Specifications. As a result, on November 29, 1990 PP&L had requested a Temporary Waiver of Compliance from the requirements of Technical Specifications 3.0.4 and 4.0.4. By letter dated November 30, 1990, PP&L applied for a permanent change to the Technical Specifications to correct the problem with sections 3.0.4 and 4.0.4 for these instruments. The Temporary Waiver of Compliance was requested to avoid entry into the Technical Specification LCO Action statements which would result in half scrams and rod blocks that unnecessarily increase the potential of a scram or otherwise restrict unit operation. The waiver was to meet PP&L's immediate needs until a Technical Specification amendment could be issued by the NRC.

On November 30, 1990 the NRC denied PP&L's request for a Temporary Waiver of Compliance since it did not meet the requirements of 10CFR50.91 for emergency or exigency changes to the Technical Specifications. The NRC did recognize that Technical Specifications 3.0.4 and 4.0.4 impose an impractical requirement on PP&L and is not warranted to assure plant safety. The NRC stated that they

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 1 Susquehanna Steam Electric Station	DOCKET NUMBER (2)  0   5   0   0   0   3   8   7	LER NUMBER (6)			PAGE (3)		
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

would not exercise any enforcement action related to these surveillance requirements temporarily so that the planned shutdowns could proceed in an orderly manner. The NRC further stated that the request for a Technical Specification amendment will be processed in an expeditious manner.

Therefore, in lieu of entering the unnecessarily restrictive LCO Action statements, PP&L is reporting the entries into Condition 2 from Condition 1 with incomplete surveillances for Unit 1 (12/2/90) and into Condition 3 from Condition 1 with incomplete surveillances for Unit 2 (12/15/90), pursuant to 10CFR50.73(a)(2)(i)(B).

CAUSE OF EVENT

The cause of this event was failure to identify that exceptions to Technical Specification sections 3.0.4 and 4.0.4, which were modified in accordance with Generic Letter 87-09, were required for certain instruments. Although this problem existed since original licensing, the legal implications relative to compliance with Tech Spec sections 3.0.4 and 4.0.4 were not identified until recently during an internal work group review.

REPORTABILITY/ANALYSIS

These events were determined reportable per 10CFR50.73(a)(2)(i)(B) in that entries were made into Condition 2 from Condition 1 for Unit 1 on 12/2/90 and into Condition 3 from Condition 1 for Unit 2 on 12/15/90 prior to having completed all surveillance requirements for the IRMs, APRMs and SRMs. This is contrary to the requirements of Technical Specifications 3.0.4 and 4.0.4.

No safety consequences or compromise to public health or safety occurred as a result of these events. The surveillances in question are not being performed because the instrumentation is believed to be inoperable. As stated in Generic Letter 87-09, "It is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. The opposite is in fact the case; the vast majority of surveillances demonstrate that systems or components are in fact operable." As long as the instrumentation is tested per Technical Specification section 4.0.3, it will be confirmed to be operable in a timely manner. This was accomplished for the subject instrumentation by performance of the required testing after entry into Condition 2 or Condition 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.

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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)

The Temporary Waiver of Compliance was requested to avoid entry into the Technical Specification LCO Action statements which would result in half scrams and rod blocks that unnecessarily increase the potential of a scram or otherwise restrict unit operation. The waiver, which was denied by the NRC, was to have met PP&L's immediate needs until a Technical Specification amendment could be issued by the NRC. Therefore, in lieu of entering the less safe LCO Action statements, PP&L is reporting the entries into Condition 2 from Condition 1 for Unit 1 (12/2/90) and into Condition 3 from Condition 1 for Unit 2 (12/15/90) with incomplete surveillances, pursuant to 10CFR50.73(a)(2)(i)(B).

In accordance with the guidelines provided in NUREG 1022 Supplement 1, Items 14.1 and 14.10, the required submission date for this report was determined to be January 2, 1991.

CORRECTIVE ACTIONS

This problem was identified during an internal work group review. Although this problem existed since original licensing, the legal implications relative to compliance with Tech Spec sections 3.0.4 and 4.0.4 were only recently identified, prior to the planned unit shutdowns in December. On November 29, 1990 PP&L requested a Temporary Waiver of Compliance from the requirements of Technical Specifications 3.0.4 and 4.0.4 for the subject instruments. On November 30, 1990 the NRC denied the request for waiver since it did not meet the requirements of 10CFR50.91 for emergency or exigency changes to the Technical Specifications. The NRC did recognize that Technical Specifications 3.0.4 and 4.0.4 impose an impractical requirement on PP&L and is not warranted to assure plant safety. The NRC stated that they would not exercise any enforcement action related to these surveillance requirements temporarily so that the planned shutdowns could proceed in an orderly manner.

On November 30, 1990 PP&L applied for a permanent change to the Technical Specifications to correct the problem with sections 3.0.4 and 4.0.4 for the subject instrumentation and requested NRC approval in time to support the Unit 2 4th refueling and inspection outage, which is currently scheduled to begin on March 9, 1991.

Surveillance testing was completed for the IRMs, APRMs and SRMs after entry into Condition 2 from Condition 1 on Unit 1 on 12/2/90 and after entry into Condition 3 from Condition 1 on Unit 2 on 12/15/90. No other conflicts relative to compliance with Technical Specifications 3.0.4 and 4.0.4 have been identified.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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.

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

Until such time that the requested Technical Specification amendment is approved by the NRC, PP&L will continue to report any additional occurrences of entry into Condition 2 or 3 from Condition 1 for either unit, pursuant to 10CFR50.73(a)(2)(i)(B).

ADDITIONAL INFORMATION

Failed Component Identification : Not applicable.

Previous Similar Events: None.