

ACCELERATED DOCUMENT DISTRIBUTION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9311030343 DOC. DATE: 93/10/27 NOTARIZED: NO DOCKET #
 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylvania 05000387
 AUTH. NAME AUTHOR AFFILIATION
 WEHRY, R.R. Pennsylvania Power & Light Co.
 STANLEY, H.G. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 93-014-00: on 930928, control rod withdrawn for performance of SR 4.9.1.2 w/reactor mode switch in refuel position. Caused by procedural non-compliance. Operating procedures revised. W/931027 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:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD1-2 LA CLARK, R	1 1 1 1	PD1-2 PD	1 1
INTERNAL:	ACRS	2 2	AEOD/DOA	1 1
	AEOD/DSP/TPAB	1 1	AEOD/ROAB/DSP	2 2
	NRR/DE/EELB	1 1	NRR/DE/EMEB	1 1
	NRR/DORS/OEAB	1 1	NRR/DRCH/HHFB	1 1
	NRR/DRCH/HICB	1 1	NRR/DRCH/HOLB	1 1
	NRR/DRIL/RPEB	1 1	NRR/DRSS/PRPB	2 2
	NRR/DSSA/SPLB	1 1	NRR/DSSA/SRXB	1 1
	REG FILE 02	1 1	RES/DSIR/EIB	1 1
	RGNI FILE .01	1 1		
EXTERNAL:	EG&G BRYCE, J.H	2 2	L ST LOBBY WARD	1 1
	NRC PDR	1 1	NSIC MURPHY, G.A	1 1
	NSIC POORE, W.	1 1	NUDOCS FULL TXT	1 1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

FULL TEXT CONVERSION REQUIRED
 TOTAL NUMBER OF COPIES REQUIRED: LTR 30 ENCL 30

A04



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

October 27, 1993

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

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 93-014-00
PLAS -579 FILE R41-2

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

Attached is Licensee Event Report 93-014-00. This event was determined reportable per 10CFR50.73(a)(2)(i)(B) in that the withdrawal of a control rod in Condition 5 for performance of Technical Specification Surveillance Requirement 4.9.1.2, without the reactor mode switch one-rod-out interlock having first been verified OPERABLE, constituted an operation prohibited by the plant's Technical Specifications.


H.G. Stanley
VP - Nuclear Operations

RRW/mjm

cc: Mr. T. T. Martin
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. G. S. Barber
Sr. Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 35
Berwick, PA 18603-0035

021112
9311030343 931027
PDR ADOCK 05000387
S PDR

TRD
11

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 8 7 1	PAGE (3) OF 0 4
---	---	---------------------------

TITLE (4)
Operation Prohibited by Plant's Technical Specification 3.9.1

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	2	8	9	3	9	3	0	1	4	0	0	1	0	2	7	9	3			0	5	0	0	0

OPERATING MODE (9) 5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 8: (Check one or more of the following) (11)									
POWER LEVEL (10) 0 0 0	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<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"/> 20.403(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)		TELEPHONE NUMBER	
NAME Richard R. Wehry - Power Production Engineer - Compliance	AREA CODE 7 1 7	NUMBER 5 4 2 1 3 6 6 4	

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS

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 0950 hours on September 28, 1993, with Unit 1 in Condition 5, Refueling, at 0% power, the Refuel position one-rod-out interlock was declared inoperable and Technical Specification Limiting Condition for Operation (LCO) 3.9.1 was entered for the purpose of performing Technical Specification Surveillance Requirement 4.9.1.2, one-rod-out interlock testing. Technical Specification 3.9.1 states that when the reactor mode switch is locked in the Refuel position, a control rod shall not be withdrawn unless the one-rod-cut interlock is OPERABLE. However, in order to verify OPERABILITY of this interlock, a control rod must be withdrawn. Therefore, when the reactor mode switch was placed in the Refuel position and a control rod was withdrawn for performance of Surveillance Requirement 4.9.1.2 on September 28, 1993 in the Refueling condition, an operation prohibited by the plant's Technical Specifications occurred. The cause of this event was attributed to procedural non-compliance by Operations personnel. Inconsistencies between operating procedures and a structural inconsistency in Technical Specification 3.9.1, Reactor Mode Switch were contributing causes to this event. Corrective actions include: reviewing this event with all Operations personnel to emphasize the importance of procedural compliance; procedure revisions to ensure consistency; and pursuit of a change to Technical Specification 3.9.1 to relieve the inconsistency contained therein.

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)		
		YEAR 9 3	SEQUENTIAL NUMBER - 0 1 4	REVISION NUMBER - 0 0	0 2	OF	0 4

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

DESCRIPTION OF EVENT

At 0950 hours on September 28, 1993, with Unit 1 in Condition 5, Refueling, at 0% power, the reactor mode switch Refuel position one-rod-out interlock was declared inoperable and Technical Specification Limiting Condition for Operation (LCO) 3.9.1 was entered for the purpose of performing Technical Specification Surveillance Requirement 4.9.1.2, one-rod-out interlock testing (EIS Code: AA). Technical Specification 3.9.1 states that when the reactor mode switch is locked in the Refuel position, a control rod shall not be withdrawn unless the one-rod-out interlock is OPERABLE. However, in order to verify OPERABILITY of this interlock, a control rod must be withdrawn. Therefore, when the reactor mode switch was placed in the Refuel position and a control rod was withdrawn for performance of Surveillance Requirement 4.9.1.2 on 9/28/93 in the Refueling condition, an operation prohibited by the plant's Technical Specifications occurred.

CAUSE OF EVENT

The cause of this event was procedural non-compliance by Operations personnel (utility; licensed).

Inconsistencies between operating procedures and a structural inconsistency in Technical Specification 3.9.1, Reactor Mode Switch were contributing causes to this event.

Technical Specification 3.9.1 ACTION b. states that "with the one-rod-out interlock inoperable in Condition 5, lock the reactor mode switch in the Shutdown position". The paradox is that the interlock must be OPERABLE in order to withdraw a control rod to perform Surveillance Requirement 4.9.1.2, but the only way for it to be OPERABLE is for the Surveillance Requirement (one-rod-out interlock test) to have been already performed. Therefore, guidance had earlier been provided to the Operations section to perform Surveillance Requirement 4.9.1.2 prior to entry into Condition 5 from Condition 4.

The operating procedure (GO-100-005) for "Plant Shutdown From Minimum Power Operation or Scram to Cold Shutdown" contained a step directing performance of Surveillance Requirement 4.9.1.2 prior to entering Condition 5, Refueling. This step was not performed prior to entering Condition 5 at 1044 hours on 9/27/93. Operating procedure (GO-100-006) for "Cold Shutdown, Defueled and Refueling", which was being performed in conjunction with GO-100-005, and which actually performs the mode change from Condition 4 (Cold Shutdown) to

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 9 3	SEQUENTIAL NUMBER - 0 1 4	REVISION NUMBER - 0 0	0 3	OF 0 4

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

Condition 5 (Refueling), contained several verification steps to be completed before entering Condition 5, but did not contain a similar step to that of GO-100-005 directing completion of Surveillance Requirement 4.9.1.2. The surveillance procedure for performing the one-rod-out interlock test (SO-156-003) also did not contain direction for performing it prior to entering Condition 5.

REPORTABILITY/ANALYSIS

This event was determined reportable per 10CFR50.73(a)(2)(i)(B) in that the placing of the reactor mode switch into the Refuel position and the withdrawal of a control rod in Condition 5, for purpose of performing the one-rod-out interlock test, without the one-rod-out interlock having first been declared OPERABLE, constituted an operation prohibited by the plant's Technical Specifications.

There were no safety consequences or compromise to public health or safety as a result of this event. The surveillance in question was not being performed because the interlock was 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". The one-rod-out interlock test was successfully performed after entry into Condition 5.

In accordance with the guidelines provided in NUREG 1022, Supplement 1, Item 14.1, the required submission date for this report was determined to be October 28, 1993.

CORRECTIVE ACTION

This event will be reviewed with all Operations personnel to emphasize the importance of procedural compliance.

Operations procedures were revised to ensure consistency between the procedures for performance of Surveillance Requirement 4.9.1.2 prior to entering Condition 5, Refueling.

PP&L is pursuing a change to Technical Specification 3.9.1 to relieve the inconsistency contained therein.

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)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

Unit 1
Susquehanna Steam Electric Station

0 | 5 | 0 | 0 | 0 | 3 | 8 | 7

YEAR	SEQUENTIAL NUMBER	REVISION NUMBER
93	014	00

0 | 4 | OF | 0 | 4

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

ADDITIONAL INFORMATION

Failed Component Identification: Not Applicable

Previous Similar Events:

LER 90-030-00, 01 described an event in which entries were made into an Operational Condition prior to having completed all necessary Surveillance Requirements.



11