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ACCESSION NBR:9312140141 DOC.DATE: 93/12/06 NOTARIZED: NO DOCKET #
 FACIL:50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylva 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 93-016-00:on 931105,discovered surveillance inadequacy
 while revising surveillance test procedure.Caused by
 procedural inadequacy.Surveillance procedures revised.W/
 931206 ltr.

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

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Pennsylvania Power & Light Company

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December 6, 1993

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

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 93-016-00
PLAS - 582 FILE R41-2

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

Attached is Licensee Event Report 93-016-00. This report is being made pursuant to 10CFR50.73(a)(2)(i)(B) in that Susquehanna Unit 1 was in a condition prohibited by the plant's Technical Specifications when it was discovered that a requirement to verify that all control rods remained fully inserted during operability demonstration of the reactor mode switch Refuel position interlocks by a second qualified individual was not performed. This was contrary to the requirements of Technical Specification 4.9.1.2 and 4.9.1.3.


H.G. Stanley
VP - Nuclear Operations

RRW/mjm

cc: Mr. T. T. Martin
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
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Mr. G. S. Barber
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U.S. Nuclear Regulatory Commission
P.O. Box 35
Berwick, PA 18603-0035

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LICENSEE EVENT REPORT (LER)

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) <u>Susquehanna Steam Electric Station - Unit 1</u>	DOCKET NUMBER (2) <u>0 5 0 0 0 3 8 7 1</u>	PAGE (3) <u>OF 0 3</u>
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TITLE (4)
Condition Prohibited By Plant's Technical Specifications Sections 4.9.1.2 and 4.9.1.3

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)
<u>1</u>	<u>1</u>	<u>0 5 9 3</u>	<u>9 3</u>	<u>0 1 6</u>	<u>0 0</u>	<u>1 2 0 6 9 3</u>				<u>0 5 0 0 0</u>

OPERATING MODE (9) <u>5</u>	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)				
POWER LEVEL (10) <u>0 10 10</u>	<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)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.38(e)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)	
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.38(e)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)		
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)		
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)		
	<input type="checkbox"/> 20.405(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)		TELEPHONE NUMBER	
NAME <u>R. R. Wehry - Power Production Engineer - Compliance</u>	AREA CODE <u>7 1 7</u>	<u>5 4 2 1 3 6 6 4</u>	

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
<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)

On November 5, 1993, with Unit 1 in Condition 5 at 0% power, Operations Support staff personnel discovered a surveillance inadequacy while revising a surveillance test procedure. Specifically, it was found that the procedure for verification of the reactor mode switch refuel position interlocks did not require that a second licensed operator (or other technically qualified Unit Staff member) verify that all control rods remained fully inserted when the mode switch was placed in the Startup position during performance of the test. Since the procedure did not require a second person verification, a second qualified person did not perform the verification. This constituted a condition prohibited by the plant's Technical Specifications. The cause of this incident was a procedural inadequacy caused by Operations support staff oversight at the time the surveillance test procedure was developed and during subsequent revisions. Although the exact cause for the oversight could not be determined, it is believed that a contributing causal factor was failure to verify that the surveillance procedure completely matched the scope of the Technical Specification requirements. The Unit 1 Surveillance procedures have been revised to require that a second licensed operator verify all control rods remain fully inserted while the mode switch is in the Startup position and training was conducted for Operations personnel. The respective Unit 2 surveillance test procedures will be similarly revised prior to the Unit 2 6th refuel outage scheduled to commence in March 1994. In addition, the checklist which is used when conducting reviews of surveillance procedure revisions will be enhanced to add a line item to verify that the procedure completely matches the scope of the Technical Specification requirements.



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			
		9 3	— 0 1 6	— 0 0	0 2	OF	0 3

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

DESCRIPTION OF EVENT

On November 5, 1993, with Unit 1 in Condition 5 at 0% power, Operations support staff personnel (utility; licensed) discovered a surveillance inadequacy while revising a surveillance test procedure. Specifically, it was found that the procedure for verification of the reactor mode switch Refuel position interlocks (EIIS Code: AA) did not require that a second licensed operator (or other technically qualified Unit Staff member) verify that all control rods (EIIS Code: AA) remained fully inserted when the mode switch was placed in the Startup position during performance of the test. Since the procedure did not require a second person verification, a second qualified person did not perform the verification. This constituted a condition prohibited by the plant's Technical Specifications.

CAUSE OF EVENT

The cause of this incident was a procedural inadequacy caused by an Operations support staff oversight at the time the surveillance test procedure was developed and during subsequent revisions. A review of all historical revisions to the procedure concluded that the second person verification requirement had never been procedurally incorporated. Although the exact cause for the Operations support staff oversight could not be determined, it is believed that a contributing causal factor was failure to verify that the surveillance procedure completely matched the scope of the Technical Specification requirements.

REPORTABILITY/ANALYSIS

This event was determined reportable per 10CFR50.73(a)(2)(i)(B) in that the failure to perform verification, by a second qualified staff member, that all control rods remained fully inserted when the reactor mode switch was in the Startup position during testing of its Refuel position interlocks, constituted a condition prohibited by the plant's Technical Specifications. Technical Specification Surveillance Requirements 4.9.1.2 and 4.9.1.3 each reference footnote ## which states: "The reactor mode switch may be placed in the Run or Startup/Hot Standby positions to test the switch interlock functions provided that all control rods are verified to remain fully inserted by a second licensed operator or other technically qualified member of the Unit technical staff."

There were no safety consequences or compromise to public health or safety as a result of this event. Although the surveillance test procedure did not require a second person verification and a second person verification was not actually performed, the licensed operator performing the surveillance test remained at the Unit operating benchboard during the time that the mode switch was in the Startup position within direct view of the full core display and other indications for control rod position. No control rods were withdrawn other than the rod selected for performance of the surveillance test by the



LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 3	0 1 6	0 0	0 3	OF	0 3

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

licensed operator and position of this rod was controlled and monitored by the licensed operator in accordance with the surveillance test procedure n.

In accordance with the guidelines provided in NUREG 1022, Supplement 1, Item 14.1 and 10CFR50.4(d), the required submission date for this report was determined to be December 6, 1993.

CORRECTIVE ACTION

The Unit 1 surveillance test procedures for the reactor mode switch Refuel position interlocks were revised to require that a second licensed operator verify all control rods remain fully inserted while the reactor mode switch is in the Startup position. Training on the revised surveillance procedures was conducted for all licensed operators. The respective Unit 2 surveillance test procedures will be similarly revised prior to the Unit 2 6th refuel outage scheduled to commence in March 1994. The checklist which is used when conducting reviews of surveillance procedure revisions will be enhanced to add a line item to verify that the procedure completely matches the scope of the Technical Specification requirements.

ADDITIONAL INFORMATION

Failed Component Identification: Not Applicable

Previous Similar Events: LER 50-388/93-003-00 reported a condition prohibited by the Technical Specifications due to a procedural inadequacy.