

PRIORITY 1
(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9505050123 DOC. DATE: 95/04/27 NOTARIZED: NO DOCKET #
 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylv 05000387
 AUTH. NAME AUTHOR AFFILIATION
 WEHRY, R.R. Pennsylvania Power & Light Co.
 STANLEY, H.G. Pennsylvania Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION

SUBJECT: LER 95-005-00: on 950329, discovered that hot restart capability test per TS 4.8.1.1.2.d.8 for D DG not performed. Caused by procedural misinterpretation. Clarifications to subj test procedures being made. W/950427 ltr.

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

NOTES:

05000387

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD1-2 PD	1 1	POSLUSNY, C	1 1
INTERNAL:	ACRS	1 1	AEOD/SPD/RAB	2 2
	AEOD/SPD/RRAB	1 1	ELLE CENTER	1 1
	NRR/DE/ECGB	1 1	NRR/DE/EELB	1 1
	NRR/DE/EMEB	1 1	NRR/DISP/PIPB	1 1
	NRR/DOPS/OECB	1 1	NRR/DRCH/HHFB	1 1
	NRR/DRCH/HICB	1 1	NRR/DRCH/HOLB	1 1
	NRR/DSSA/SPLB	1 1	NRR/DSSA/SPSB/B	1 1
	NRR/DSSA/SRXB	1 1	RES/DSIR/EIB	1 1
	RGN1 FILE 01	1 1		
EXTERNAL:	L ST LOBBY WARD	1 1	LITCO BRYCE, J H	2 2
	NOAC MURPHY, G.A	1 1	NOAC POORE, W.	1 1
	NRC PDR	1 1	NUDOCS FULL TXT	1 1
NOTES:		1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 504-2083) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

FULL TEXT CONVERSION REQUIRED
 TOTAL NUMBER OF COPIES REQUIRED: LTTR 28 ENCL 28



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 215/774-5151


April 27, 1995

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

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 95-005-00
PLAS- 630 **FILE R41-2**

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

Attached is Licensee Event Report 95-005-00. This report is being made pursuant to 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications due to a surveillance requirement that was inadvertently missed.


H.G. Stanley
VP - Nuclear Operations

RRW/toc

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

Ms. Maitri Banerjee
Sr. Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 35
Berwick, PA 18603-0035

000007

9505050123 950427
PDR ADOCK 05000387
S PDR

JE22

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 3		
--	--	--	--	--	--	---------------------------------------	--	--	--------------------	--	--

TITLE (4)
Missed Diesel Generator Surveillance Requirement - Technical Specification Non-compliance

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

OPERATING MODE (9) 5	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	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(b)							
	<input type="checkbox"/> 20.405(a)(1)(f)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)							
	<input type="checkbox"/> 20.405(a)(1)(g)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)							
	<input type="checkbox"/> 20.405(a)(1)(h)	<input checked="" type="checkbox"/> 50.73(a)(2)(f)	<input type="checkbox"/> 50.73(a)(2)(v)(A)								
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.73(a)(2)(g)	<input type="checkbox"/> 50.73(1)(2)(v)(B)								
<input type="checkbox"/> 20.405(a)(1)(j)	<input type="checkbox"/> 50.73(a)(2)(h)	<input type="checkbox"/> 50.73(a)(2)(c)									

(LICENSEE CONTACT FOR THIS LER (12))

NAME Richard R. Wehry - Project Engineer, Nuclear Licensing	TELEPHONE NUMBER AREA CODE: 7 1 7 5 4 2 - 3 6 6 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)

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 March 29, 1995, with Unit 1 in Condition 5 (Refueling) at 0% power and Unit 2 in Condition 1 (Power Operation) at 100% power, a non-compliance with the plant's Technical Specifications was discovered during an engineering review of past Emergency Diesel Generator (DG) surveillance testing. Specifically, a hot restart capability test, per Technical Specification 4.8.1.1.2.d.8, for the 'D' DG was not performed, as required, during the Unit 2 fifth refueling outage (September - November 1992). The hot restart test was performed on 1/2/94 during the Unit 1 seventh refueling outage, but the time period from the Unit 2 fifth refueling outage (September - November 1992) to the 1/2/94 performance date represented a period of non-compliance with the Technical Specifications. The cause for the missed surveillance requirement was attributed to an ambiguous procedure step which allowed misinterpretation by the system test director at the time that the test was to be performed during the Unit 2 fifth refueling outage. There were no safety consequences or compromises to public health and safety as a result of the missed test requirement. Three DGs remained operable in full compliance with the Technical Specifications throughout the period of non-compliance, as required by the Susquehanna Safety Analysis. Based on successful testing of the 'D' DG hot restart capability prior to and after the period of non-compliance, there is also no reason to believe that its hot restart capability was ever in question. The subject test procedures are being further clarified in order to prevent recurrence.

**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 5	- 0 0 5	- 0 0	0 2	OF 0 3

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

DESCRIPTION OF EVENT

On March 29, 1995, with Unit 1 in Condition 5 (Refueling) at 0% power and Unit 2 in Condition 1 (Power Operation) at 100% power, a non-compliance with the plant's Technical Specifications was discovered during an internal engineering review of past Emergency Diesel Generator (DG; EIS Code: ED) surveillance testing. Specifically, a hot restart capability test, per Technical Specification 4.8.1.1.2.d.8, for the 'D' DG was not performed, as required, during the Unit 2 fifth refueling outage (September - November 1992). The hot restart test was performed on 1/2/94 during the Unit 1 seventh refueling outage, but the time period from the Unit 2 fifth refueling outage to the 1/2/94 performance date represented a period of non-compliance with the Technical Specifications. As such, this incident is reportable per 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications.

CAUSE OF EVENT

The cause for the missed surveillance requirement was attributed to procedural misinterpretation by the system test director (utility; non-licensed) at the time that the testing was to be performed during the 1992 Unit 2 fifth refueling outage. Susquehanna contains a fifth and spare DG ('E' DG) which can be substituted in for any one of the four (4) aligned DGs. Technical Specification 18-month testing is performed during refueling outages on Unit 1 and Unit 2 with the 'E' DG being substituted in for one of the 'A' through 'D' DGs such that each DG is tested at least once per 18 months. The 'E' DG had been substituted for the 'D' DG during the Unit 1 sixth refueling outage (March - May 1992) and a hot restart test had been performed for the 'E' DG. The previous hot restart test for the 'D' DG had been performed during the Unit 1 fifth refueling outage (September - November 1990). The next scheduled hot restart test for the 'D' DG was to be during the Unit 2 fifth refueling outage (September - November 1992). During review by the system test director for DG testing to be performed in the Unit 2 fifth refueling outage, the system test director determined that a procedure prerequisite step had been satisfied by the performance of a hot restart test on the 'E' DG during the Unit 1 sixth refueling outage (when the 'E' DG had been substituted in for the 'D' DG). This interpretation of an unclear procedure prerequisite step resulted in not performing a hot restart test for the 'D' DG during the Unit 2 fifth refueling outage, when it should have been.

**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 5	- 0 0 5	- 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 to be reportable per 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications in that a surveillance requirement for the 'D' DG had not been completed during the time period from the Unit 2 fifth refueling outage (September - November 1992) to 1/2/94. All Technical Specification requirements, with the exception of the hot restart capability test, had been successfully completed for the 'D' DG. Three (3) DGs remained operable in full compliance with the Technical Specifications throughout the period of 'D' DG non-compliance, as required by the Susquehanna Safety Analysis. Based on successful testing of the 'D' DG's hot restart capability prior to and after the period of non-compliance, there is also no reason to believe that its hot restart capability was ever in question. As such, there were no consequences or compromises to public health and safety as a result of the missed surveillance test requirement.

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 April 28, 1995.

CORRECTIVE ACTIONS

The required hot restart capability test for the 'D' DG was completed on 1/2/94. No other instances of missed hot restart capability testing were found for any of the remaining DGs at Susquehanna, and all DGs are within the envelope of Technical Specification surveillance requirements.

Additional clarifications to the subject test procedures are being made to prevent recurrence.

ADDITIONAL INFORMATION

Failed Component Identification: None

Previous Similar Events: Licensee Event Report 50-387 / 94-009-00 reported a condition prohibited by the plant's Technical Specifications in which an incorrect interpretation resulted in missed instrument channel response time testing.