

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 4		
--	--	--	--	--	--	--	--	--	--	-------------------------------------	--	--	----------------------	--	--

TITLE (4)
Condition Prohibited By The Plant's Technical Specifications (LCO 3.0.3)

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

OPERATING MODE (9) 1		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR Y : (Check one or more of the following) (11)										
POWER LEVEL (10) 1 0 0	20.402(b)			20.405(c)			50.73(a)(2)(v)			73.71(b)		
	20.405(a)(1)(i)			50.36(c)(1)			50.73(a)(2)(v)			73.71(c)		
	20.405(a)(1)(ii)			50.36(c)(2)			50.73(a)(2)(vi)			OTHER (Specify in Abstract below and in Text, NRC Form 366A)		
	20.405(a)(1)(iii)			X 50.73(a)(2)(i)			50.73(a)(2)(vi)(A)					
	20.405(a)(1)(iv)			50.73(a)(2)(ii)			50.73(1)(2)(vi)(B)					
20.405(a)(1)(v)			50.73(a)(2)(iii)			50.73(a)(2)(v)						

(LICENSEE CONTACT FOR THIS LER (12))

NAME Richard R. Wehry - Licensing Engineer							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)	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

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

At 0443 hours on April 26, 1995 and 0038 hours on April 29, 1995, with Unit 2 in Condition 1 (Power Operation) at 100% power, 18 month surveillance tests SE-124-107 (Division I) and SE-124-207 (Division II), 18 Month Emergency Diesel Generators (EDG) Auto Start and ESS Buses Energization on Loss of Offsite Power With a LOCA - Plant Shutdown, were being performed for their respective divisions on Unit 1, which was in Condition 5 (Refueling) at 0% power. As part of this testing, the undervoltage start signals from the subject division's ESS Buses (two load groups) to the respective EDGs are disabled. With the undervoltage circuits disabled, the subject ESS Buses (two load groups) are considered not energized per Technical Specification 3.8.3. Since Unit 2 Technical Specification 3.8.3.1 requires that the Unit 1 load groups remain energized for common A.C. distribution system loads and only contains provisions for one (1) load group not energized, entry into LCO ACTION 3.0.3 on Unit 2 was required during each division's testing. During the Division II testing, Operations determined that LCO 3.0.3 entry was not required. Subsequent evaluation determined that LCO 3.0.3 was applicable. PP&L is pursuing an amendment to the Unit 2 Technical Specifications to eliminate the need for entry into LCO ACTION 3.0.3 when conducting this testing. Operations training on this event is also being conducted.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

Unit 2
Susquehanna Steam Electric Station

0 5 0 0 0 3 8 8

YEAR

SEQUENTIAL NUMBER

REVISION NUMBER

9 5

0 0 6

0 0

2 OF 4

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

DESCRIPTION OF EVENT

At 0443 hours on April 26, 1995 and 0038 hours on April 29, 1995, with Unit 2 in Condition 1 (Power Operation) at 100% power, 18 month surveillance tests SE-124-107 (Division I) and SE-124-207 (Division II), 18 Month Emergency Diesel Generators (EDG; EIISE Code: EK) Auto Start and Engineered Safety System (ESS) Buses (EIISE Code: EB) Energization on Loss of Offsite Power With a LOCA - Plant Shutdown, were being performed for their respective divisions on Unit 1, which was in Condition 5 (Refueling) at 0% power. As part of this testing, the undervoltage start signals from the subject division's ESS Buses (two load groups) to the respective EDGs are disabled. With the undervoltage circuits disabled, the subject ESS Buses (2 load groups) are considered not energized per Technical Specification 3.8.3. Since Unit 2 Technical Specification 3.8.3.1 requires that the Unit 1 ESS load groups remain energized for common A.C. distribution system loads and only contains provisions for one (1) load group being not energized, entry in LCO ACTION 3.0.3 on Unit 2 was required during each division's testing.

When the Division II testing was performed on April 29, 1995, an Operations' (utility; licensed) evaluation determined that LCO 3.0.3 entry was not required and that Technical Specification LCO 3.8.1.1 ACTION e. on Unit 1 was only applicable. LCO 3.8.1.1 ACTION e. provides actions necessary if both required offsite power circuits are inoperable. Subsequent review, however, concluded that, based on the actual method in which the test is performed, ESS Bus protective features are actually disabled and, as such, Technical Specification LCO 3.8.3 is applicable for both Unit 1 and Unit 2. Since Unit 2 Technical Specification LCO 3.8.3 does not contain provisions for two Unit 1 load groups being not energized, entry into LCO ACTION 3.0.3 on Unit 2 was required.

CAUSE OF EVENT

The need to enter LCO ACTION 3.0.3 on Unit 2 was a result of 18 month surveillance testing being performed on Unit 1 during its eighth refueling outage. The testing resulted in two (2) ESS load groups per division on Unit 1 being considered not energized per Technical Specification 3.8.3 during each division's test due to the undervoltage protection circuits for those load groups being disabled. Since Unit 2 Technical Specification 3.8.3.1 requires that the Unit 1 ESS load groups remain energized for common A.C. distribution system loads and only contains provisions for one (1) load group being not energized, entry into LCO ACTION 3.0.3 on Unit 2 was required during

each division's testing. It is noted that this entry did not occur at the time of the Division II test due to questions regarding the proper interpretation of Technical Specification requirements related to this testing.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

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 9 5	SEQUENTIAL NUMBER — 0 0 6	REVISION NUMBER — 0 0	3	OF	4			

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 Technical Specification LCO ACTION 3.0.3 was entered on Unit 2 during performance of an 18 month surveillance test on Unit 2. Each division's test resulted in two (2) ESS load groups on Unit 1 being considered not energized per Technical Specification 3.8.3 due to the undervoltage protection circuits for those load groups being disabled. Since Unit 2 Technical Specification 3.8.3.1 requires that the Unit 1 ESS load groups remain energized for common A.C. Distribution system loads and only contains provisions for one (1) load group being not energized, entry into LCO ACTION 3.0.3 on Unit 2 was required during each division's testing.

Although the Technical Specifications require considering the load groups as not energized when the undervoltage start signals to the EDGs are disabled during the surveillance testing, the load groups remained energized during the time that LCO ACTION 3.0.3 was in effect, except for the testing time period (less than 10 seconds) from bus deenergization to reenergization by the EDGs, and the design safety function of the undervoltage start circuitry was not called upon. As such, there was no significant degradation in the Station's ability to protect the health and safety of the public and / or plant personnel. For these reasons, PP&L believes that it is appropriate to submit a license amendment to eliminate the requirement to enter LCO 3.0.3 when these tests are performed. Technical Specification LCO ACTION 3.0.3 was applicable from 0443 hours to 0556 hours on April 26, 1995 and from 0038 hours to 0217 hours on April 29, 1995.

In accordance with guidance provided in NUREG 1022, Supplement 1, item 14.1, the required submission date for this report was determined to be May 26, 1995.

CORRECTIVE ACTION

PP&L is pursuing an amendment to the Unit 2 Technical Specifications to eliminate the need for entry into LCO ACTION 3.0.3 for conducting this testing.

This event is being reviewed with operations personnel to reiterate the need for entry into LCO 3.0.3 for the subject testing until such time that an amendment to the Unit 2 Technical Specifications is obtained.

**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)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

Unit 2
Susquehanna Steam Electric Station

0 5 0 0 0 3 8 8

YEAR

9 5

SEQUENTIAL
NUMBER

0 0 6

REVISION
NUMBER

0 0

4 OF 4

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

ADDITIONAL INFORMATION

Failed Component Identification: None

Previous Similar Events: LER 94-001 documented a previous entry into LCO ACTION 3.0.3 on Unit 2 due to an 18 month LOCA / LOOP surveillance test performance on Unit 1.

