

PRIORITY 1

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ACCESSION NBR: 9506120203 DOC.DATE: 95/06/02 NOTARIZED: NO DOCKET #
 FACIL: 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylvania 05000388
 AUTH.NAME AUTHOR AFFILIATION
 WEHRY, R.R. Pennsylvania Power & Light Co.
 STANLEY, H.G. Pennsylvania Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 95-007-00: on 950227, identified that two electrical penetrations had not been tested per 10CFR50 App J. Caused by personnel error during initial installation. TS Action 4.0.3 entered & Type B testing completed. W/950602 ltr.

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

NOTES:

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	AEOD/SPD/RRAB		1	1	<u>FILE CENTER</u>		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
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	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
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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), U7.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 1				PAGE (3) OF 0 3	
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TITLE (4)
Condition Prohibited By The Plant's Technical Specifications - Type B Testing Not Performed For Two Penetrations

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 2	2 7	9 5	9 5	0 0 7	0 0	0 6	0 2	9 5			0 5 0 0 0	

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5 : (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)(e)	50.36(c)(2)	50.73(a)(2)(v)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)							
	20.405(a)(1)(w)	X 50.73(a)(2)(i)	50.73(a)(2)(v)(A)								
	20.405(a)(1)(v)	50.73(a)(2)(f)	50.73(1)(2)(v)(B)								
20.405(a)(1)(x)	50.73(a)(2)(u)	50.73(a)(2)(x)									

(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
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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 February 27, 1995, with Unit 2 in Condition 1 at 100% it was identified that two electrical penetrations had not been tested pursuant to 10CFR50 Appendix J. These penetrations are utilized for electrical cables, installed in 1983, that are associated with the Excore Neutron Monitoring System. The original installation did not identify the penetrations as requiring 10CFR50 Appendix J testing. Preoperational 10CFR50 Appendix J testing was successfully performed. However, the 10CFR50 Appendix J testing requirements for these penetrations were not transferred to PP&L documents that identify the 10CFR50 Appendix J testing requirements. The electrical penetrations were successfully leak tested per 10CFR50 Appendix J within twenty four (24) hours of discovery. A review of appropriate drawings, procedures and licensing documents was completed to assure that Unit 2 penetrations that require 10CFR50 Appendix J testing have been tested. The only penetrations not yet confirmed by plant walkdown to be properly identified relative to testing requirements are those which are in inaccessible or high radiation areas. These penetrations will be visually verified during the next Unit 2 refueling outage. All documentation discrepancies are being corrected. A review of the PP&L nuclear modifications program confirmed that all required surveillance testing requirements are considered as part of the modifications process. There were no safety consequences or compromises to the public health or safety from this event. Note that an administrative tracking error resulted in this report being issued in excess of 30 days. Corrective actions to the reportability tracking area have been put in place 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 2 Susquehanna Steam Electric Station	DOCKET NUMBER (2) 0 5 0 0 0 3 8 8	LER NUMBER (6)						PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER						
		9 5 —	0 0 7 —	0 0	2	OF	3			

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

DESCRIPTION OF EVENT

On February 27, 1995, with Unit 2 in Condition 1 (Power Operation) at 100% power, work planning reviews to support Local Leak Rate Testing (LLRT) identified two primary containment (EIISE Code: NH) electrical penetrations which had not been tested pursuant to 10CFR50 Appendix J. These penetrations are utilized for electrical cables associated with the Excore Neutron Monitoring System (EIISE Code: IG) which were installed in 1983.

CAUSE OF EVENT

Original installation by the A/E, in 1983, did not identify the penetrations as requiring 10CFR50 Appendix J testing. Preoperational 10CFR50 Appendix J testing was successfully performed. However, the 10CFR50 Appendix J testing requirements for these penetrations were not transferred to PP&L documents which identify 10CFR50 Appendix J testing requirements.

REPORTABILITY / ANALYSIS

This incident was determined to be reportable per 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications in that two primary containment electrical penetrations had not been Type B tested pursuant to 10CFR50 Appendix J since their installation in 1983. Preoperational integrated leak rate testing (ILRT) was successfully completed in 1983 following installation. The most recent ILRT performed on Unit 2 (1992) was also successful. Following identification that these penetrations had not been tested per 10CFR50 Appendix J, Technical Specification Action 4.0.3 was entered at 1400 hours on February 27, 1995. The requirements of Technical Specification Action 4.0.3 allowed 24 hours for satisfactory completion of Type B testing for the subject penetrations or the action of Technical Specification 3.6.1.1, Primary Containment Integrity, would have to be taken. Type B testing for the subject electrical penetrations was satisfactorily completed within the allotted 24 hour time frame. Based on the successful Type B testing performed, it is concluded that the Technical specification limit of 0.6 La(190.7 slm) was never exceeded. As such, there were no safety consequences or compromises to the public health or safety as a result of this condition.

NRC FORM 366a (6-89)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED OMB NO. 3159-0104 EXPIRES: 4/30/92 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.
LICENSEE EVENT REPORT (LER) TEXT CONTINUATION		

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)						PAGE (3)		
Unit 2		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	REVISION NUMBER	REVISION NUMBER	REVISION NUMBER	REVISION NUMBER	REVISION NUMBER	REVISION NUMBER
		9 5	0 0 7	0 0	0 0	3	OF	3		
Susquehanna Steam Electric Station	0 5 0 0 0 3 8 8									

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

In accordance with guidance provided in NUREG 1022, Supplement 1, Item 14.1, the required submission date for this report was determined to be March 29, 1995. However, due to an administrative tracking error, the requirement for a written report within 30 days was missed. Interim corrective actions to prevent recurrence have been put in place. Additionally, a format root cause analysis is being performed to determine the root cause and causal factors and to implement any additional actions to prevent recurrence as warranted.

CORRECTIVE ACTIONS

Following identification that these penetrations had not been tested, Technical Specification Action 4.0.3 was entered and Type B testing was satisfactorily completed within the allowed 24 hour time frame of Technical Specification 4.0.3.

A review of pertinent documentation containing primary containment penetration information, including design drawings, applicable Technical Specification tables and the applicable sections of the final Safety Analysis Report was completed by the engineering organization. No instances were found on Unit 1 for which Type B or C testing of penetrations had not been completed. No other instances have been found on Unit 2 for which Type B or C testing has not been completed; however, 27 penetrations which are in inaccessible or high radiation areas still require visual verification to confirm that they are spares or do not require Type B or C testing. These visual verifications will be completed during the Unit 2 seventh refueling outage. Some document discrepancies were found as a result of the document review and walkdowns of penetrations to-date. All document discrepancies are being corrected.

PP&L's plant modification program will prevent recurrences of this nature. Since the 1983 subject modifications, PP&L has performed three plant modifications which have added Type B/C penetrations in primary containment. All have been captured by PP&L's program for ensuring performance of all required surveillance testing.

ADDITION INFORMATION

Failed Component Identification : Not applicable.

Previous Similar Events: LER 50-387 / 91-012-00
 LER 50-387 / 02-015-03