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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9511270248 DOC.DATE: 95/11/13 NOTARIZED: NO DOCKET #
 FACIL:50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylva 05000387
 AUTH.NAME AUTHOR AFFILIATION
 CODDINGTON,C.T. Pennsylvania Power & Light Co.
 STANLEY,H.G. Pennsylvania Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 95-012-00:on 951013,unit 1 in condition 1 at 100% power
 & unit 2 at 0% power,cooling tower total site blowdown flow
 failed validation.Caused by personnel error.Training
 provided to personnel on requirements.W/951113 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: 05000387

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Pennsylvania Power & Light Company

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November 13, 1995

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

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 50-387/95-012-00
PLAS - 655 FILE R41-2

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

Attached is Licensee Event Report 50-387/95-012-00. This event was determined to be reportable per 10CFR50.73(a)(2)(i)(B) in that the cooling tower blowdown flow instrumentation was in service without meeting the necessary surveillance requirements. This is a condition prohibited by the Technical Specifications.


H.G. Stanley
VP - Nuclear Operations

CTC/dmd

cc: Mr. T. T. Martin
Regional Administrator, Region I
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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), 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
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TITLE (4)
Condition Prohibited by Plant's Technical Specifications

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)
1	0	1	3	9	5	9	5	0	SSSES Unit 2		0 5 0 0 0 3 8 8
1	0	1	3	9	5	9	5	0			0 5 0 0 0

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § : (Check one or more of the following) (11)									
POWER LEVEL (10) 1 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)(i)	<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)(j)	<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)(k)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(v)(A)							
	<input type="checkbox"/> 20.405(a)(1)(l)	<input type="checkbox"/> 50.73(a)(2)(j)	<input type="checkbox"/> 50.73(1)(2)(v)(B)							
<input type="checkbox"/> 20.405(a)(1)(m)	<input type="checkbox"/> 50.73(a)(2)(k)	<input type="checkbox"/> 50.73(a)(2)(v)								

(LICENSEE CONTACT FOR THIS LER (12))

NAME Cornelius T. Coddington - Sr. Project Engineer, Nuclear Licensing	TELEPHONE NUMBER
	AREA CODE: 7 1 7 NUMBER: 5 4 2 - 3 2 8 9

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)

<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

At 1550 hours on October 11, 1995, with Unit 1 in Condition 1 (Power Operation) at 100% power and with Unit 2 in Condition 2 (Cold Shutdown) at 0% power, the cooling tower total site blowdown flow failed its validation. Upon subsequent investigation, it was discovered on October 13, 1995, that functional testing of the low flow interlock portion of the cooling tower total site blowdown flow instrumentation had not been performed as required by Technical Specification 4.3.7.10. This event is reportable per 10CFR50.73(a)(2)(i)(B) in that Susquehanna SES Units 1 and 2 were in a condition prohibited by the Technical Specifications. The low flow interlock was acceptably demonstrated in March 1995. Failure to perform the surveillance would not have, by itself, prevented the discharge line from isolating on low cooling tower blowdown flow to control the release of radioactive material. The total blowdown flow instrumentation is currently removed from service and individual cooling tower blowdown flow instrumentation is being utilized. Instrumentation required to establish and monitor the necessary flow rates for effluent releases was unaffected by this oversight. Therefore, it is concluded that adequate flows were established and maintained and that no significant environmental impact related to plant operations has occurred. There was no safety consequence or compromise to the public health and safety as a result of the total flow instrumentation not being surveilled.

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

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 1 2 —	0 0	2	OF	4			

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

EVENT DESCRIPTION

At 1550 hours on October 11, 1995, with Unit 1 in Condition 1 (Power Operation) at 100% power and with Unit 2 in Condition 2 (Cold Shutdown) at 0% power, the cooling tower total site blowdown flow failed its validation. The total site blowdown low flow interlock (EIS Code: I) had been recently installed as a modification to the plant. The total site blowdown low flow interlock had a channel functional test performed on March 20, 1995, via a test procedure. Following completion of the modification that installed this device, testing the logic operation of the flow loop. The performance of this procedure satisfies the functional surveillance requirements for operability, except administratively; a surveillance cover sheet was not processed. The low flow interlock was declared operable on June 27, 1995, and placed in service on July 3, 1995. The total site blowdown low flow interlock was in service from July 3, 1995 until October 11, 1995 when the total site blowdown flowrate indication validation failed while performing its operating procedure. The total site blowdown flow element was removed from service at that time. The cause of the total site blowdown flow element failure is still under investigation. The most probable cause is biological debris that fouled the total site blowdown flow element when the Unit 2 Cooling Tower was returned to service following the Fall refueling outage.

From July 3, 1995 to October 11, 1995, the total site blowdown low flow interlock was used to meet the requirements of Technical Specification 3.3.7.10, Instrument 3.b. During this period, the Technical Specification quarterly surveillance requirement expired on July 14, 1995 because the new total blowdown flow low flow switch had not been addressed in the quarterly surveillance procedure. Since the interlock is required to be operable at all times, the plant was in noncompliance with the operability requirements of a Limiting Condition for Operation.

CAUSE OF EVENT

It was determined that the individual responsible for the system did not address the administrative requirement to reference the appropriate surveillance and identify that a Surveillance Authorization coversheet for the test procedure would satisfy the operational testing surveillance criteria. This was a procedural noncompliance. A thorough review of procedures has determined that no generic procedural weaknesses are present that have a safety significance. In addition, a previously assigned corrective action addressing similar circumstances is still open.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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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 1 2	— 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), in that Susquehanna SES Units 1 and 2 were in a condition prohibited by the Technical Specifications when liquid radwaste was released while the total site blowdown low flow interlock was inoperable. Technical Specification 3.3.7.10 requires the low flow interlock to be operable at all times.

Release of liquid radwaste (LRW) with an inoperable device (Technical Specification 3.3.7.10 instrument 3.b) does not affect the ability of the plant to shutdown safely, nor was the health and safety of the public challenged. At no time was a LRW release made with less than the required minimum amount of dilution flow. Prior to each release, the flowmeter was channel checked as required by Technical Specification 4.3.7.10. Based on this channel check, less than minimum flow was never experienced during a release. The plant response to a postulated transient would not be changed as a result of this event.

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 November 13, 1995.

CORRECTIVE ACTIONS

The following corrective actions have been identified:

- Provide training to appropriate personnel on the administrative requirements to reference the appropriate surveillances and the use of a Surveillance Authorization coversheet.
- Enhance appropriate procedures accordingly to clarify operability testing documentation .
- Ensure the modification installation documentation specifically determines if a Technical Specification related item is added, deleted, or modified, and identify key Technical Specification parameters that are affected.
- Review all released modifications (currently not closed) to ensure Technical Specification identified requirements have been properly addressed.
- Complete corrective actions previously assigned for a similar event.

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

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)						PAGE (3)						
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER										
Unit 1														
Susquehanna Steam Electric Station	0 5 0 0 0 3 8 7	9 5	— 0 1 2	— 0 0			4	OF	4					

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

ADDITIONAL INFORMATION

Past Similar Events:

Docket No. 50-387 LER 90-008-00
LER 91-012-00

Docket No. 50-388 LER 93-008-00

Failed Component: None