

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9703100046 DOC. DATE: 97/03/03 NOTARIZED: NO DOCKET #
FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylvania 05000387
AUTH. NAME AUTHOR AFFILIATION
WEHRY, R.R. Pennsylvania Power & Light Co.
KUCZYNSKI, G.J. Pennsylvania Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 97-003-00: on 970131, condition prohibited by plant TSs re testing of individual control rods identified. Caused by personnel error. TS amend request issued to NRC. Training on event provided. W/970303 ltr.

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TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

05000387

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March 3, 1997

U.S. Nuclear Regulatory Commission
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SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 50-387/97-003-00
PLAS - 697 FILE R41-2

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

Attached is Licensee Event Report 50-387 / 97-003-00. 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 an interpretation of the Technical Specifications to allow testing of individual control rods when in Operational Conditions 3 and 4 was not in strict, verbatim compliance with the existing wording of the Technical Specifications. The interpretation has been deleted and a Technical Specification amendment request has been submitted.


G. J. Kuczyński

Plant Manager - Susquehanna SES

Attachment

cc: Mr. H. J. Miller
Regional Administrator
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Mr. Kenneth M. Jenison
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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: 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 1						DOCKET NUMBER (2) 0 5 0 0 0 3 8 7 1			PAGE (3) OF 0 3		
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TITLE (4) Condition Prohibited by Plant's Technical Specifications - Interpretation Not In Strict, Verbatim 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	1	3	1	9	7	9	7	0	0	3	0	0	0	3	8	7	1	0	3
									SSES - Unit 2		0	5	0	0	0	3	8	8	

OPERATING MODE (9) 1		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 1: (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)			50.38(c)(1)			50.73(a)(2)(v)			73.71(c)					
	20.405(a)(1)(f)			50.38(c)(2)			50.73(a)(2)(v)			OTHER (Specify in Abstract below and in Text, NRC Form 368A)					
	20.405(a)(1)(g)			X 50.73(a)(2)(g)			50.73(a)(2)(w)(A)								
	20.405(a)(1)(h)			50.73(a)(2)(h)			50.73(1)(2)(w)(B)								
20.405(a)(1)(k)			50.73(a)(2)(k)			50.73(a)(2)(o)									

(LICENSEE CONTACT FOR THIS LER (12))											
NAME Richard R. Wehry - Nuclear 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 NFRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NFRDS		

SUPPLEMENTAL REPORT EXPECTED (14)								EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)								X NO				

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

On January 31, 1997, with Unit 1 and Unit 2 in Operational Condition 1 at 100% and 75% power, respectively, it was determined that an interpretation of the plant's Technical Specifications to allow testing of individual control rods with the plant in Operational Conditions 3 or 4 was not in strict, verbatim compliance with the wording of the Technical Specifications. Namely, footnote *** to Table 1.2, which states that the reactor mode switch may be placed in the Refuel position when the plant is in Condition 3 or 4 while a single control rod is being recoupled, was interpreted to allow this action for performing single rod testing. The interpretation had been used to support single control rod testing during refueling outages on both Susquehanna units from 1995 to present. Although technically justifiable, this constituted a non-compliance with the Technical Specifications from a strict, verbatim compliance perspective. There were no safety consequences or compromises to public health or safety. The root cause for this condition was attributed to human error at the time the original interpretation was issued in 1994, in that strict, verbatim compliance with the wording of the Technical Specifications was not assured. The interpretation was deleted and a Technical Specification amendment request was issued to the NRC. Training on the circumstances of the event and reemphasis on verbatim compliance with licensing basis documents was completed for applicable personnel.

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) Unit 1 Susquehanna Steam Electric Station	DOCKET NUMBER (2) 0 5 0 0 0 3 8 7	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th colspan="6" style="text-align: center;">LER NUMBER (6)</th> <th colspan="3" style="text-align: center;">PAGE (3)</th> </tr> <tr> <th style="width:10%;">YEAR</th> <th style="width:10%;"></th> <th style="width:10%;">SEQUENTIAL NUMBER</th> <th style="width:10%;"></th> <th style="width:10%;">REVISION NUMBER</th> <th style="width:10%;"></th> <th style="width:10%;"></th> <th style="width:10%;"></th> <th style="width:10%;"></th> </tr> <tr> <td>9</td> <td>7</td> <td>—</td> <td>0</td> <td>0</td> <td>3</td> <td>—</td> <td>0</td> <td>0</td> </tr> <tr> <td colspan="6"></td> <td>2</td> <td>OF</td> <td>3</td> </tr> </table>	LER NUMBER (6)						PAGE (3)			YEAR		SEQUENTIAL NUMBER		REVISION NUMBER					9	7	—	0	0	3	—	0	0							2	OF	3
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

DESCRIPTION OF EVENT

On January 31, 1997, with Unit 1 and Unit 2 in Operational Condition 1 (Power Operation) at 100% and 75% power, respectively, it was determined that an interpretation of the plant's Technical Specifications to allow testing of individual control rods with the plant in Operational Conditions 3 (Hot Shutdown) or 4 (Cold Shutdown) was not in strict, verbatim compliance with the wording of the Technical Specifications. Namely, Technical Specification Table 1.2, footnote ***, which states that the reactor mode switch may be placed in the Refuel position when the plant is in Condition 3 or 4 while a single control rod is being recoupled, was interpreted to allow placing the mode switch in the Refuel position during the same plant conditions for performing single control rod testing. The interpretation had been used to support single control rod testing during refueling outages on both Susquehanna units from 1995 to present. Although technically justifiable, this constituted a non-compliance with the Technical Specifications from a strict, verbatim compliance perspective.

CAUSE OF EVENT

The root cause for this condition was attributed to human error by Nuclear Compliance personnel (utility; non-licensed) at the time the original Technical Specification interpretation was issued in 1994, in that strict, verbatim compliance with the wording of the Technical Specifications was not assured. A Technical Specification amendment request to properly amend the Technical Specifications to allow single control rod testing in Operational Conditions 3 and 4 was not processed at that time.

It should be noted that when the interpretation was made in 1994, the involved personnel believed that the interpretation met the intent of the Technical Specifications for controls required with respect to withdrawal of a single control rod from the core and, furthermore, addressed a shortcoming contained in the plant's Technical Specifications in that the Technical Specifications provided no guidance on acceptable methods for required control rod drive post maintenance testing. At no time was the intent of the Technical Specifications not complied with.

REPORTABILITY / ANALYSIS

This condition was determined to be reportable per 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications in that an interpretation of the Technical Specifications, issued in 1994, to allow testing of individual control rods with the plant in Operational Conditions 3 or 4 was not in strict, verbatim compliance with the existing wording of the Technical Specifications.



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

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)						PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	REVISION NUMBER	REVISION NUMBER	REVISION NUMBER	PAGE	OF	PAGES
Susquehanna Steam Electric Station	05000387	97	003	00	00	00	3	OF	3	

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

There were no safety consequences or compromises to public health and safety as a result of this identified condition. With the reactor mode switch in the Refuel position, the analyses for control rod withdrawal during refueling are applicable (whether for recoupling or withdrawal for testing) and, provided the assumptions of these analyses are satisfied in Operational Conditions 3 and 4 (which the Technical Specification interpretations satisfied), these analyses bound the consequences of an accident. Explicit safety analysis in FSAR Section 15.4.1.1 demonstrates that the functioning of the refueling interlocks and adequate shutdown margin preclude unacceptable reactivity excursions.

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 March 3, 1997.

CORRECTIVE ACTIONS

The Technical Specification interpretations pertaining to both Susquehanna Unit 1 and Unit 2 were deleted.

A Proposed Amendment to the Unit 1 and Unit 2 Technical Specifications was issued to the NRC to request amendment enabling the withdrawal of single control rods for testing with the plant in Operational Conditions 3 or 4.

Training on the circumstances of this event and reemphasis on verbatim compliance with licensing basis documents was completed for applicable personnel.

ADDITIONAL INFORMATION

Failed Component Identification: None

Past Similar Events: None

