

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9706020129 DOC. DATE: 97/05/23 NOTARIZED: NO DOCKET #
 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylv 05000387
 AUTH. NAME AUTHOR AFFILIATION
 CODDINGTON, C. T. Pennsylvania Power & Light Co.
 KUCZYNSKI, G. J. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 97-010-00: on 961013, discovered reactor vessel water level instrument channels were not placed in trip condition. Caused by inadequate review of revised procedures. Will revise surveillance & test procedures. W/970523 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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SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 50-387/97-010-00
PLAS - 711 FILE R41-2

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

Attached is Licensee Event Report 50-387/97-010-00. This event was determined to be reportable per 10CFR50.73(a)(2)(i)(B) in that certain instrument channels were not placed in the tripped condition as required by the Technical Specification Action statements during the Unit 1 Boundary System Leakage/Hydrostatic Pressure Test. This is a condition prohibited by the Technical Specifications.


G. J. Kuczyński
General Manager - Susquehanna SES

Attachment

cc: Mr. H. J. Miller
Regional Administrator
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

300038

Mr. Kenneth M. Jenison
Sr. Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 35
Berwick, PA 18603-0035

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PDR ADOCK 05000387
S PDR



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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)
Reactor Vessel Water Level Instrumentation In Condition 4 Not Tripped In Accordance With 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	6	9	7	0	0	1	0	0	0	0	0	0	0				

OPERATING MODE (9) 4	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 1.1 (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)(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)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)						
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)							
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	<input type="checkbox"/> 50.73(a)(2)(ix)							
	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(x)								

NAME Cornelius T. Coddington, Licensing Engineer		TELEPHONE NUMBER 7 1 7 5 4 2 - 3 2 9 4	
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPD'S	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPD'S		

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO								

ABSTRACT (Limit to 140 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On March 25, 1997, with Unit 1 in Condition 1 (Power Operation) at 100% power, Engineering personnel (Utility; non-licensed) discovered during a review of the Boundary System Leakage/Hydrostatic Pressure Test procedure for Unit 2, that the Reactor Vessel Level (Low Level 3) instruments had been isolated but the Limiting Condition for Operation (LCO) for Technical Specification 3.3.2 had not been entered during the Unit 1 Boundary System Leakage/Hydrostatic Pressure Test in October 1996. The applicable operational condition for the reactor vessel water level switches had been revised in a Technical Specification Amendment dated December 18, 1995. During the investigation of this event, it was determined on April 30, 1997, that the time limits of the LCO ACTION statements had been exceeded during the October 1996 test performance. This constituted a condition prohibited by Technical Specifications and is reportable per 10CFR50.73(a)(2)(i)(B). The cause was determined to be that the list of procedures requiring revision (approximately 380), generated using a draft of the proposed amendment to the Technical Specifications, was not validated against the list that would have been generated if the actual submitted amendment request had been used. Corrective actions include the revision to surveillance and test procedures, and review of the event with station personnel re-emphasizing that procedural revisions required for Technical Specification implementation are validated against the actual submitted amendment request, per the approved administrative procedure. There were no safety consequences or compromises to public health and safety as a result of these events since, even though the automatic isolation signal was not available, the isolation valves were functional and could have been manually closed in accordance with plant operating procedures.



LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 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)		
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		9 7	0 1 0	0 0			2	OF	4	

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

EVENT DESCRIPTION

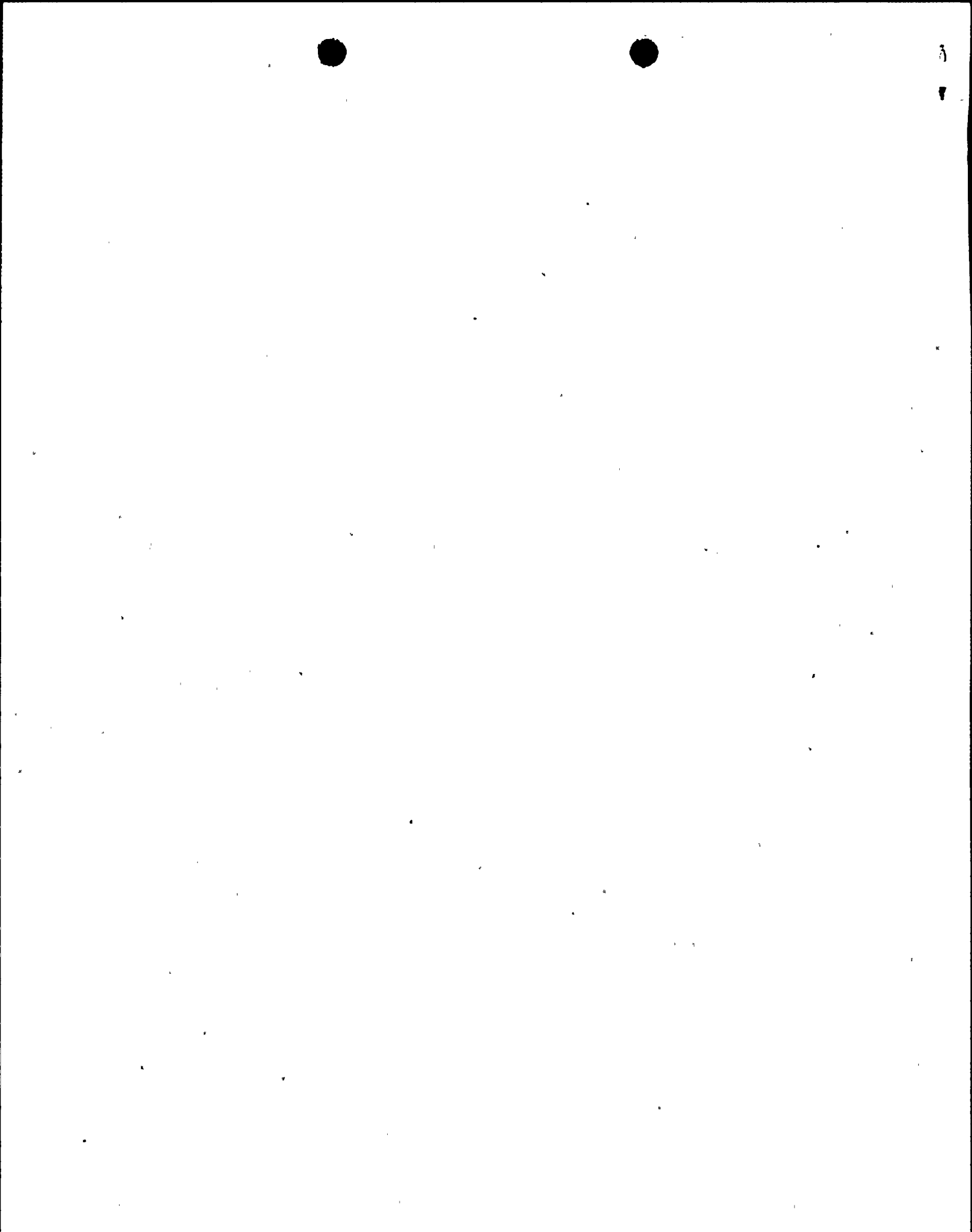
On March 25, 1997, with Unit 1 in Condition 1 (Power Operation) at 100% power, Engineering personnel (Utility; non-licensed) discovered during a review of the Boundary System Leakage/Hydrostatic Pressure Test procedure for Unit 2, that Unit 1 Reactor Vessel Level (Low Level 3) instruments (EIS Code: I) had been isolated and the Limiting Condition for Operation (LCO) for Technical Specification 3.3.2 had not been entered during the Unit 1 Boundary System Leakage/Hydrostatic Pressure Test in October 1996. During the investigation of this event, it was determined on April 30, 1997, that the time limits of the LCO ACTION statements had been exceeded during the October 1996 Unit 1 test performance. This constituted a condition prohibited by Technical Specifications and is reportable per 10CFR50.73(a)(2)(i)(B). In an amendment to the Technical Specifications dated December 18, 1995, the applicable conditions for the subject Reactor Vessel Water Level instruments had been revised from Operational Conditions 1, 2 and 3 to Operational Conditions 3, 4 and 5. The Boundary System Leakage/Hydrostatic Pressure Test is performed in Operational Condition 4. The test procedure had not been revised to include the revised applicable operational conditions for the subject Reactor Vessel Water Level instruments. Also, the associated instrument surveillance procedures had not been revised.

CAUSE OF EVENT

The cause of the event was determined to be inadequate review by work group personnel (utility; non-licensed) for procedures required to be revised (approximately 380 procedures) in order to implement the Technical Specification amendment. The review for the procedures was performed using a preliminary draft version of the Technical Specification amendment that did not contain the revisions to the applicable operational conditions for the Reactor Vessel Water Level instruments, which the submitted and approved Technical Specification amendments contained. This review was not performed in accordance with approved plant procedures for Technical Specification amendment implementation, which resulted in not validating the list of procedures which needed to be revised against the actual submitted request for Technical Specification amendment.

REPORTABILITY/ANALYSIS

As a prerequisite to performing the Boundary System Leakage/Hydrostatic Pressure Test, all four (4) Reactor Vessel Water Level instruments are removed from service. Because of the revision to the Technical Specifications approved on December 15, 1995, Technical Specification 3.3.2 ACTION c should have been entered. ACTION c states that with one or more automatic functions with isolation capability



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TEXT CONTINUATION

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FACILITY NAME (1) Unit 1	DOCKET NUMBER (2)	LER NUMBER (6)						PAGE (3)		
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not maintained, restore isolation capability within one hour. When all four (4) Reactor Vessel Water Level instruments were removed from service during the prerequisite to perform the Boundary System Leakage/Hydrostatic Pressure Test, the isolation function was not maintained. ACTION d states that if ACTIONS b or c are not met, take the ACTION required by Table 3.3.2-1 for the function. The ACTION required by Table 3.3.2-1 for the Reactor Vessel Water Level is to initiate action to restore the channel to OPERABLE status; or, initiate action to isolate the Residual Heat Removal (RHR) Shutdown Cooling System. The Bases for this Technical Specification states that the ACTION should be taken immediately. A review of the Boundary System Leakage/Hydrostatic Pressure Test documentation concluded that the exact times when the Reactor Vessel Water Level instruments were taken out of service and returned to service could not be conclusively determined. Considering test documentation and other documentation, the following was concluded on April 30, 1997:

- The water level instruments were removed from service between 0001 and 0440 hours on October 13, 1996.
- The RHR Shutdown Cooling System was removed from service at 0447 hours on October 13, 1996. The water level instruments are not required to be operable when the RHR Shutdown Cooling System is out of service.
- The RHR Shutdown Cooling System was returned to service at 0918 hours on October 14, 1996.
- The water level instruments were returned to service between 1300 and 1700 hours on October 14, 1996.

Thus, this event was determined to be reportable per 10CFR50.73(a)(2)(i)(B), in that Susquehanna SSES Unit 1 was in a condition prohibited by the Technical Specifications when the LCO Action Statement time limits for Technical Specification 3.3.2 Actions c and d were exceeded for the Reactor Vessel Water Level (Low-Level 3) instruments following the return of RHR Shutdown Cooling System to service.

There were no safety consequences or compromises to public health and safety as a result of these events since, even though the automatic isolation signal was not available, the isolation valves were functional and could have been manually closed in accordance with plant operating procedures.

In accordance with the guidelines provided in NUREG-1022, Supplement 1, Item 14.1, the required submission date for this report was determined to be May 30, 1997.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

CORRECTIVE ACTIONS

Corrective actions that have been completed include: revising the Unit 2 surveillance procedures associated with the water level instrumentation, revising the Unit 2 Boundary System Leakage/Hydrostatic Pressure Test procedure, and verifying that no other procedures required revisions.

Corrective actions to be completed include:

- Revising the Unit 1 surveillance procedures for the water level instrumentation.
- Revising the Unit 1 Boundary System Leakage/Hydrostatic Pressure Test procedure.
- Reviewing the circumstances surrounding the event with station personnel, including assuring that any procedural revisions required for Technical Specification amendment implementation are validated against the actual submitted request for amendment, per the approved administrative procedure.

ADDITIONAL INFORMATION

Past Similar Events: None

Failed Component: None