

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9706030090 DOC. DATE: 97/05/27 NOTARIZED: NO DOCKET #
 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylv 05000387
 AUTH. NAME AUTHOR AFFILIATION
 CODDINGTON, C. Pennsylvania Power & Light Co.
 KUCZYNSKI, G. J. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 97-012-00: on 970424, fire watch not established within time limits occurred. Caused by inadequate technical review by station personnel during generation of change to surveillance procedure. Procedure revised. W/970527 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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INTERNAL:	ACRS		1	1	AEOD/SPD/RAB	2	2	
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	RES/DET/EIB		1	1	RGN1 FILE 01	1	1	
EXTERNAL:	L ST LOBBY WARD		1	1	LITCO BRYCE, J H	1	1	
	NOAC POORE, W.		1	1	NOAC QUEENER, DS	1	1	
	NRC PDR		1	1	NUDOCS FULL TXT	1	1	
NOTES:			1	1				

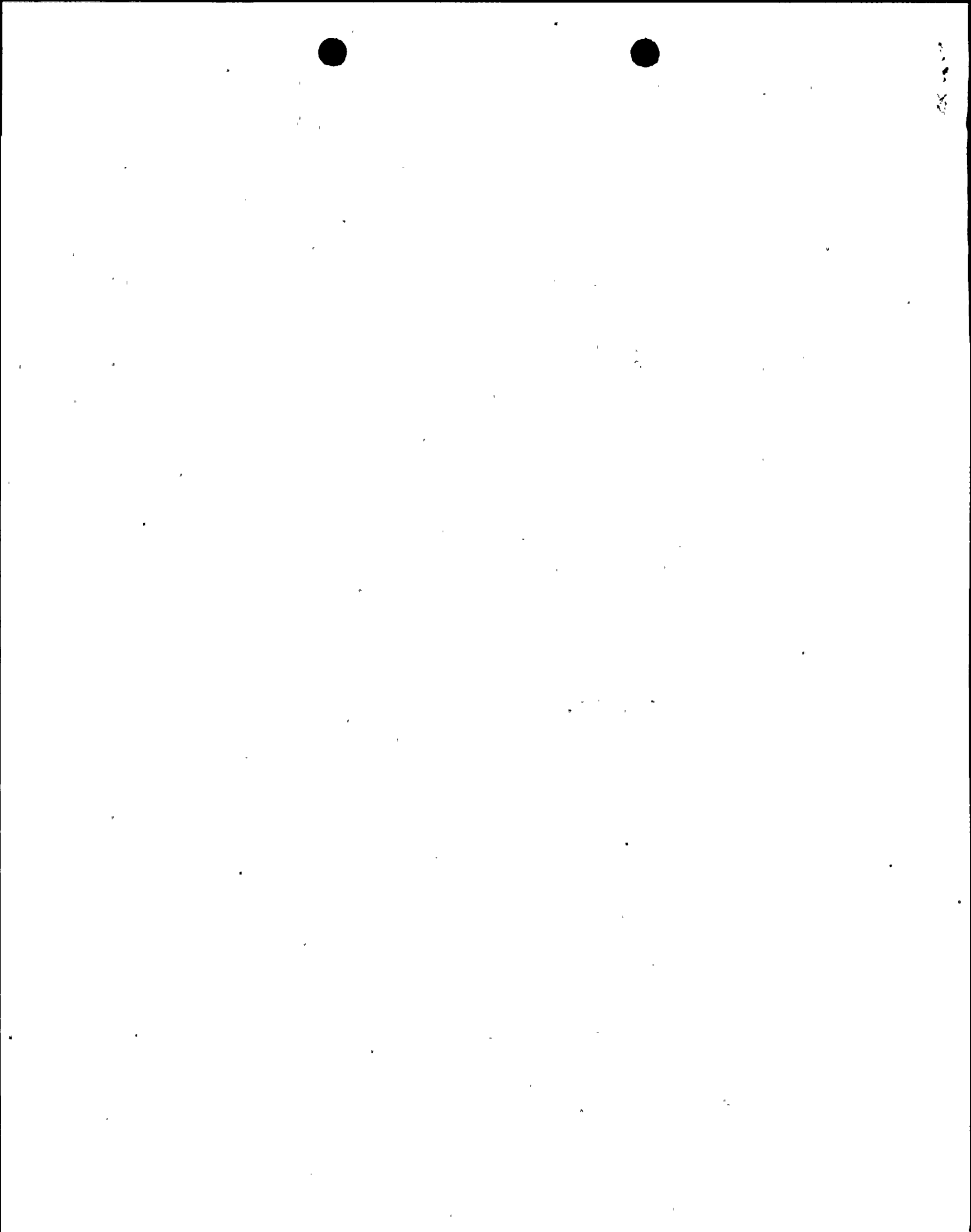
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Pennsylvania Power & Light Company

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MAY 27 1997

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 50-387/97-012-00
PLAS - 713 FILE R41-2

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

Attached is Licensee Event Report 50-387/97-012-00. This event was determined to be reportable per 10CFR50.73(a)(2)(i)(B) in that the carbon dioxide fire protection system shutoff valves were not surveilled nor actions taken in accordance with the Technical Specifications, as a result of their having been inadvertently deleted during a procedure revision. This is a condition prohibited by the Technical Specifications.

G. J. Kuczynski fac
G. J. Kuczynski

General Manager - Susquehanna SES

Attachment

cc: Mr. H. J. Miller
Regional Administrator
U. S. Nuclear Regulatory Commission
475 Allendale Road
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Mr. Kenneth M. Jenison
Sr. Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 35
Berwick, PA 18603-0035

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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)

FACILITY NAME (1)

Susquehanna Steam Electric Station - 1

DOCKET NUMBER(2)

0 5 0 0 0 3 8 7 1 OF 0 4

PAGE (3)

TITLE (4)

Firewatch Not Established Within Time Limits

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

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 101.11 : (Check one or more of the following) (11)									
1	0	20.402(b)	20.405(e)	50.73(a)(2)(v)	73.71(b)						
POWER LEVEL (10)	1 0 0	20.405(a)(1)(i)	50.36(e)(1)	50.73(a)(2)(v)	73.71(c)						
		20.405(a)(1)(ii)	50.36(e)(2)	50.73(a)(2)(v)	OTHER (Specify in Abstract below and in Text, NRC Form 388A)						
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(v)(A)							
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(1)(2)(v)(B)							
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(v)							

(LICENSEE CONTACT FOR THIS LER (12))

NAME		TELEPHONE NUMBER	
Cornelius T. Coddington - Sr. Licensing Engineer		AREA CODE	7 1 7 5 4 2 - 3 2 9 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)

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

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

On April 24, 1997, with Unit 1 in Condition 1 (Power Operation) at 100% power and Unit 2 in Condition 5 (Refueling) at 0% power, Operations Engineering personnel (Utility; non-licensed) discovered during a review of the surveillance procedure which verifies valve alignment in the fire protection systems, that the shutoff valves for the carbon dioxide (CO₂) fire protection system had been deleted from this surveillance procedure during a revision to the procedure in December 1996. Technical Specification 4.7.6.3.1 requires that these valves be surveilled monthly to insure their proper alignment and the operability of the CO₂ fire protection system. Since these valves had not been surveilled since November 1996, the Limiting Condition for Operation (LCO) for Technical Specification 3.7.6.3 should have been entered and a continuous firewatch posted. The continuous firewatch was not established within the time limits of Technical Specification 3.7.6.3 ACTION a; therefore, this constitutes a condition prohibited by Technical Specifications and is reportable per 10CFR50.73(a)(2)(i)(B). Upon discovery that the valves were deleted from the monthly surveillance procedure, the procedure was revised and the surveillance of the valves was satisfactorily performed. The cause of the event was determined to be an inadequate review of the revision to the surveillance procedure. The corrective actions that were completed include revision to the surveillance procedure, performance of the surveillance, and discussion of the importance of accuracy and verification with the individuals involved with the revision of the surveillance procedure. Additional corrective actions include revising the procedure change process and reviewing and revising the fire protection operational surveillances to ensure accuracy. There were no safety consequences or compromises to public health and safety as a result of this event, since when the surveillance was performed, the valves successfully passed and there is no other indication that the valves were in other than their required position during this time frame.

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 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 7	—	0 1 2	—	0 0	2	OF	4	

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

EVENT DESCRIPTION

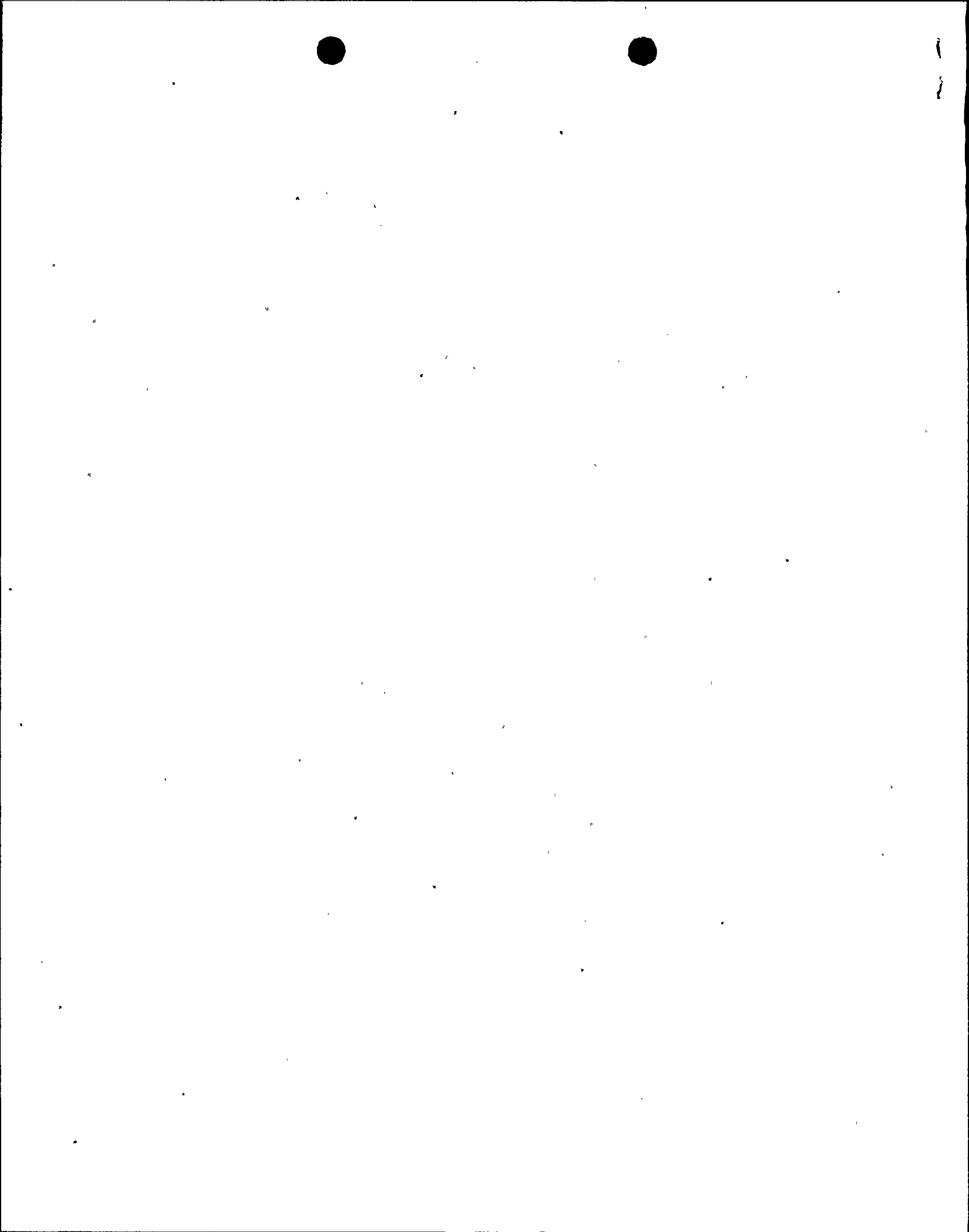
On April 24, 1997, with Unit 1 in Condition 1 (Power Operation) at 100% power and Unit 2 in Condition 5 (Refueling) at 0% power, Operations Engineering personnel (Utility; non-licensed) discovered during a review of the surveillance procedure which checks valve alignment in the fire protection systems, that the shutoff valves for the carbon dioxide (CO₂) fire protection system (EIS Code: KQ) had been deleted from this surveillance procedure during a revision to the procedure in December 1996. Technical Specification 4.7.6.3.1 requires that these valves be surveilled monthly to insure their proper alignment and the operability of the CO₂ fire protection system. Since these valves had not been surveilled since November 1996, the Limiting Condition for Operation (LCO) for Technical Specification 3.7.6.3 should have been entered and a continuous firewatch posted. The continuous firewatch was not established within the time limits of Technical Specification 3.7.6.3 ACTION a; therefore, this constitutes a condition prohibited by Technical Specifications and is reportable per 10CFR50.73(a)(2)(i)(B). Upon discovery that the valves were deleted from the monthly surveillance procedure, the procedure was revised and the surveillance of the valves was satisfactorily performed.

CAUSE OF EVENT

The cause was determined to be inadequate technical review by station personnel during the generation of the change to the surveillance procedure. In addition, the CO₂ shutoff valves were not identified as Technical Specification valves in the prior surveillance procedure revisions.

REPORTABILITY/ANALYSIS

In November 1996, Engineering personnel were requested to review and revise the surveillance procedure for monthly fire protection system valve alignment checks to eliminate those valves which do not require monthly checks. During the process of revising the surveillance procedure, the shutoff valves for the CO₂ fire protection system were deleted from the procedure. The revised procedure was issued in early December 1996 and the shutoff valve alignment (open) was not verified until April 1997. Technical Specification surveillance requirement 4.7.6.3.1 requires that the alignment of these valves be verified monthly to assure operability of the CO₂ fire protection system. Since the valves were not verified to be in their proper alignment from December 1996 to April 1997, the CO₂ fire protection system should have been declared inoperable and a continuous firewatch established. Since the continuous firewatch was not established within the time limits of Technical Specification 3.7.6.3 ACTION a, this constitutes a condition prohibited by Technical Specifications and is reportable per 10CFR50.73(a)(2)(i)(B).



LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

If these valves were closed and a fire were to occur, CO₂ could not be discharged to that particular area. After it was discovered that these valves were deleted from the surveillance procedure, the procedure was revised and the valves were verified to be in their open position. Since the only procedural method of closing these valves is by the use of a permit, there is no indication that these valves were out of their normally open position during this time frame. Therefore, there were no safety consequences or compromises to public health and safety as a result of this event.

In accordance with the guidelines provided in NUREG-1022, Supplement 1, Item 14.1 and 10CFR50.4, the required submission date for this report was determined to be May 27, 1997.

CORRECTIVE ACTIONS

Corrective actions that have been completed include:

- Revising the surveillance procedure to include the CO₂ fire protection system shutoff valves.
- Performing the surveillance on the CO₂ fire protection system shutoff valves.
- Discussing the importance of accuracy and verification with the individuals involved with the revision that removed the CO₂ fire protection system shutoff valves.

Corrective actions that have been identified and are to be completed:

- Revise the procedure change process to better define the requirements for technical and cross-disciplinary review and provide for sign-off that the review has been completed.
- Review and revise, as appropriate, fire protection operational surveillance procedures to ensure the accuracy of these procedures.

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

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		YEAR		SEQUENTIAL NUMBER		REVISION NUMBER				
		9 7	—	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: None

Failed Component: None

