

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9709120083 DOC. DATE: 97/09/08 NOTARIZED: NO DOCKET #
 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylvania 05000387
 AUTH. NAME AUTHOR AFFILIATION
 ELLIS, S. J. Pennsylvania Power & Light Co.
 KUCZYNSKI, G. J. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 97-018-00: on 970808, determined that requirements of Tech Spec Surveillance 4.3.2.3 were not fulfilled. Caused by weaknesses in surveillance procedures & programs. Performed response time testing. W/970908 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:

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Pennsylvania Power & Light Company

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September 8, 1997

U.S. Nuclear Regulatory Commission
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SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 50-387/97-018-00
PLAS - 721 FILE R41-2

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

Attached is Licensee Event Report 50-387/97-018-00. This report is being made pursuant to 10CFR50.73(a)(2)(i)(B) in that Susquehanna SES Unit 1 had not performed the required Response Time Testing on two relays in the logic of two containment isolation valves. This constitutes a condition prohibited by the plant's Technical Specifications.

G. J. Kuczynski
G. J. Kuczynski
General Manager - Susquehanna SES

Attachment

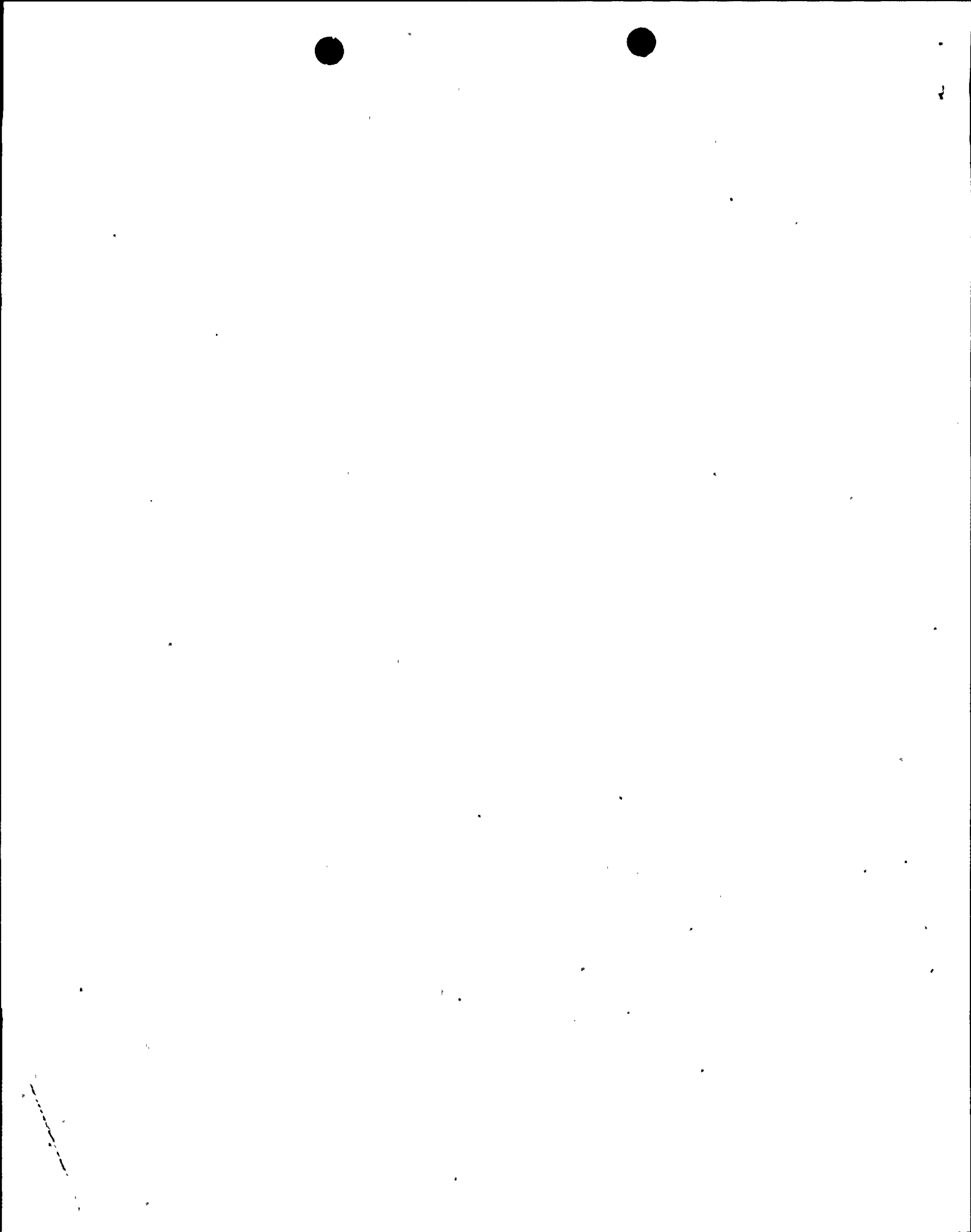
cc: Mr. H. J. Miller
Regional Administrator
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Mr. Kenneth M. Jenison
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LICENSEE EVENT REPORT (LER)

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)
Relay In Isolation Logic Not Response Time Tested

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	8	0	8	9	7	9	7	0	1	8	0	0	0	9	0	8	9	7			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)(v)	<input type="checkbox"/> 50.38(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)						
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.38(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(i)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)						
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input checked="" type="checkbox"/> 50.73(a)(2)(f)	<input type="checkbox"/> 50.73(a)(2)(v)(A)							
	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(f)	<input type="checkbox"/> 50.73(1)(2)(v)(B)							
<input type="checkbox"/> 20.405(a)(1)(x)	<input type="checkbox"/> 50.73(a)(2)(f)	<input type="checkbox"/> 50.73(a)(2)(v)								

(LICENSEE CONTACT FOR THIS LER (12))

NAME Stephen J. Ellis - Licensing Engineer	TELEPHONE NUMBER
	AREA CODE: 7 1 7 NUMBER: 5 4 2 - 3 5 3 7

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS

SUPPLEMENTAL REPORT EXPECTED (14)

<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15) MONTH: DAY: YEAR:
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On August 7, 1997 at 1515 hours, with Unit 1 in Condition 1 (Power Operation) at 100% Power, it was determined that the requirements of Technical Specification Surveillance 4.3.2.3 were not fulfilled. This constitutes a condition prohibited by the Technical Specifications. During preparation of a Technical Specification Change Request, it was identified that two relays associated with two Reactor Building Closed Cooling Water (RBCCW) isolation valves had not been response time tested and are outside the scope of the Licensing Topic Report NEDO32291A, for equipment not requiring response time testing. Upon identification, the appropriate Limited Condition for Operation (LCO) actions were entered. The relays were promptly tested and deemed to meet their associated valve's closing time requirements. The cause of the event has been identified as weaknesses in the surveillance procedures and programs at the time of inception of the Response Time Testing (RTT) procedures. These shortcomings have been addressed by program enhancements during the ensuing years. The subject relays have been periodically logic tested (but not time response tested) with no observed misoperation. The safety significance of this event is considered minor. The health and welfare of the public was not compromised. The following corrective actions have been completed: the RTT was completed and approved and comprehensive review of the Isolation Actuation System Logic with respect to RTT was completed. Incorporation of the timing of the subject relays into an appropriate surveillance is scheduled for future completion.

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

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

EVENT DESCRIPTION

On August 7, 1997 at 1515 hours, with Unit 1 in Condition 1 (Power Operation) at 100% Power, it was determined that two relays requiring Response Time Testing (RTT) per Technical Specifications had not been tested, constituting a condition prohibited by the Technical Specifications.

During the preparation of a response to an NRC Request for Additional Information on the RTT elimination, (Proposed Technical Specification Change Request per PLA-4597, April 4, 1997, and addressed in Licensee Event Report (LER) 50-387/97-008-00), it was discovered that two relays associated with the Reactor Building Closed Cooling Water (RBCCW) (EIS Code: CC) had not been response time tested as required by Technical Specifications surveillance requirements 4.3.2.3. The subject relays are part of the Primary Containment Isolation System Logic. The relays have been determined to be outside the scope of Licensing Topic Report NEDO32291A, which provides the basis for elimination of response time testing for other equipment.

CAUSE OF EVENT

This event occurred at the time of the inception of the RTT program. The relays were missed in the original program. It is noteworthy that this condition exists only on Unit 1. Unit 2 has no similar relays in its logic. The cause of missing these relays in the original program has been identified as less than adequate procedures and programs at that time (approximately 1983). Improvements to these programs and procedures have been instituted in the intervening time period, which address and resolve the initial weaknesses.

REPORTABILITY/ANALYSIS

This event was determined to be reportable per 10CFR50.73(a)(2)(i)(B), in that Susquehanna Unit 1 was in a condition prohibited by the Technical Specifications.

The surveillance requirement for the Isolation Actuation System (IAS) instrumentation is defined in Section 4.3.2.3 of the Technical Specifications, as:

The ISOLATION SYSTEM RESPONSE time of each trip function shall be determined to be within its limit at least once per eighteen months.

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

The complete response time of two RBCCW isolation valves were not tested in their entirety. One relay in the logic path of each valve had never been tested.

Upon identifying this condition, the appropriate Limited Conditions for Operation (LCO) ACTION statements were entered, ACTIONS b.2 and b.1 of Technical Specification 3.3.2. Technical Specification 4.0.3 provision of 24 hours for "missed surveillance" was determined to be applicable. The condition was entered into the Susquehanna SES corrective action program for tracking and documenting.

The subject relays were promptly tested and found, when their operating times were added to their respective valves closing times, to meet the timing requirement as noted in Technical Specification Table 3.6.3-1. The results of this testing was appropriately reviewed and approved by station management. The LCO ACTIONS were then cleared without the need to utilize the full 24 hour allowance as provided by Technical Specification 4.0.3.

The subject relays have been tested periodically during the Containment Isolation System logic functional tests. No abnormal operation of the RBCCW Isolation Valves had been noted. Although the functional test did not record the relay actuation times, it is reasonable to assume, based on experience with this type relay operation, and vendor specifications, that since the relays operated, their response times would have been some fraction of a second and well within the testing requirements. Based on these considerations, the safety significance of the event described in this LER is minor. At no time was the safety of the public or the ability of the plant to shutdown in a safe manner compromised.

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 September 8, 1997.

CORRECTIVE ACTIONS

The following corrective actions have been completed:

- Performed response time testing on subject relays and verified that the results satisfied the time requirements for the isolation of the associated isolation valves.
- Performed comprehensive review of the IAS requirement with regard to RTT, relative to components tested and components required to be tested.

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TEXT CONTINUATION

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

- Examined the existing surveillance programs and have concluded no programmatic actions are necessary. Improvements to the surveillance test program, including the Technical Specification Cross-Reference Matrix, and the Highlighted Drawing Program, have been made since the time of the initial establishment of the RTT program. The necessary controls are in place to ensure additions or revisions to existing surveillance procedures maintain the required scope of testing.

The following action is scheduled to be completed:

- Incorporate the timing of the two RBCCW logic relays into a surveillance procedure.

ADDITIONAL INFORMATION

Failed Component: None

Past Similar Events: LER 50-387/97-008-00