NRC FORM 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 04/30/98
ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Susquehanna Steam Electric Station - Unit 2	05000388	1 OF 3

TITLE (4)
PCIV Position Indication Not Surveilled in Accordance With the 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 NAME	DOCKET NUMBER
										05000
10	30	97	97	-- 008 --	00	12	01	97	FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)			
POWER LEVEL (10)	100	20.2201(b)	20.2203(a)(2)(v)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)
		20.2203(a)(1)	20.2203(a)(3)(i)	50.73(a)(2)(ii)	50.73(a)(2)(x)
		20.2203(a)(2)(i)	20.2203(a)(3)(ii)	50.73(a)(2)(iii)	73.71
		20.2203(a)(2)(ii)	20.2203(a)(4)	50.73(a)(2)(iv)	OTHER
		20.2203(a)(2)(iii)	50.36(c)(1)	50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
		20.2203(a)(2)(iv)	50.36(c)(2)	50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Cornelius T. Coddington, Senior Engineer-Nuclear Licensing	(717) 542-3294

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

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On October 30, 1997, with Unit 2 in Condition 1 (Power Operation) at 100% power, Operations personnel (Utility; non-Licensed) determined that the position indication for the Containment Radiation Detection System primary containment isolation valves and the Traversing Incore Probe (TIP) Shear valves had not been surveilled in accordance with Accident Monitoring Instrumentation Technical Specification Table 4.3.7.5-1, Item 12. Additionally, the position indication in the Control Room for Containment Atmosphere Control System primary containment isolation valves had not been surveilled. This event was determined to be reportable in accordance with 10CFR50.73(a)(2)(i)(B). The position indications for these valves were declared inoperable and Technical Specification 3.3.7.5, ACTION 80 was entered. The subject position indications were satisfactorily surveilled and declared OPERABLE. The cause of the event was determined to be human performance in that the subject valves' position indication verification had not been incorporated into the surveillance testing procedure. Corrective actions include: 1) the surveillance procedure for Technical Specification 3.3.7.5 was revised to include the subject valves; 2) the ITS Bases will be revised to provide a link between the primary containment isolation valve listing and the accident monitoring requirements; 3) the current Technical Specifications will be reviewed to ensure there are no other similar links between Technical Specification Sections that are not clearly annotated, and 4) this event will be reviewed with the appropriate functional groups.. There were no consequences to the health and safety of the public from not surveilling the position indication of these valves since 1) other means such as flow indication are available to the operator to determine valve position and 2) when the surveillances were performed the indication satisfactorily passed the surveillances.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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TEXT *(If more space is required, use additional copies of NRC Form 366A)* (17)

EVENT DESCRIPTION

On October 30, 1997, with Unit 2 in Condition 1 (Power Operation) at 100% power, Operations personnel (Utility; non-Licensed) determined that the position indication (EIIS Code: IP) for the Containment Radiation Detection System primary containment isolation valves and the Traversing Incore Probe (TIP) Shear valves had not been surveilled in accordance with Accident Monitoring Instrumentation Technical Specification Table 4.3.7.5-1, Item 12. Additionally, the position indication in the Control Room for Containment Atmosphere Control System primary containment isolation valves had not been surveilled. This event was determined to be reportable in accordance with 10CFR50.73(a)(2)(i)(B). The position indications for these valves were declared inoperable and Technical Specification 3.3.7.5, ACTION 80 was entered. The position indications were satisfactorily surveilled and declared OPERABLE.

CAUSE OF EVENT

The cause of the event was determined to be human performance in that the subject values' position indication verification had not been incorporated into the surveillance testing procedure by Operations personnel. There was also a lack of full understanding of Regulatory Guide 1.97 remote monitoring requirements by Operations personnel. The facts that 1) the requirement to suveil Primary Containment Isolation Valve (PCIV) position indication is unique to Unit 2; and 2) there is no clear annotation in Technical Specifications linking the listing of the PCIVs in Specification 3.6.3 and the requirement to surveil the position indication for those valves in Specification 3.3.7.5 were identified as causal factors.

REPORTABILITY/ANALYSIS

During a review in preparation for the implementation of Improved Technical Specifications (ITS), Operation personnel determined that the position indication for the Containment Radiation Detection System primary containment isolation valves had not been included in the surveillance procedure for other Post Accident Monitoring instrumentation. Technical Specification 3.3.7.5 requires a monthly channel check for the position indication for primary containment isolation valves; but the Specification does not provide a listing of the primary containment isolation valves. Specification 3.6.3 provides the listing of the Unit's primary containment isolation valves. When the Unit 2 Containment Radiation Detection System valves were added in the Fall of 1995, Specification 3.6.3 and its associated surveillance procedures were updated to include these valves. However, the surveillance procedure associated with Specification 3.3.7.5 was not updated. There is no clear annotation in Technical Specifications linking the listing of the valves in Specification 3.6.3 and the requirements of Specification 3.3.7.5. Additionally, the position indication for the TIP Shear valves was not included in the surveillance procedure. These valves were included in the original design of the unit. The requirement to surveil position indication is a unique requirement to the Unit 2 Technical Specifications.

The review further determined that the Control Room portion of the position indication for the Containment Atmosphere Control valves was not being surveilled. Only the local indication of these valves was being surveilled.

the above conditions were determined to be reportable in accordance with 10CFR50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications.

There were no consequences to the health and safety of the public from not surveilling the position indication of these valves since: 1) other means such as flow indication are available to the operator to determine valve position; and 2) when the surveillances were performed all indications satisfactorily passed the surveillances.

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 December 1, 1997.

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TEXT *(If more space is required, use additional copies of NRC Form 366A)* (17)

CORRECTIVE ACTIONS

Corrective actions that have been completed include:

- The appropriate surveillance procedure for primary containment isolation valve position indication was revised to include the Containment Radiation Detection System valves, TIP Shear valves and the Control Room indication for the Containment Atmosphere Control valves and all position indications were satisfactorily tested.

Corrective actions that will be completed:

- Review of the Technical Specifications to ensure there are no other similar links between Technical Specifications that are not clearly annotated.
- Revise the Bases for the Improved Technical Specifications to provide a link between the primary containment valves and the position indication surveillances.
- Review the circumstances related to the human performance issues, identified in the root cause, with the Operations staff procedure writers and site Licensing personnel.

ADDITIONAL INFORMATION

Past Similar Events: Docket No. 50-387 LER 97-023-00
LER 95-012-00
LER 90-008-00

50-388 LER 93-008-00

Failed Component: None