

LICENSEE EVENT REPORT (LER)

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

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.

FACILITY NAME (1) Susquehanna Steam Electric Station - Unit 1		DOCKET NUMBER (2) 05000387	PAGE (3) 1 OF 4
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TITLE (4)
Action Requirements Were Not Met In Order To Perform Required Surveillances

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
5	02	98	98	-- 009	-- 00	6	01	98	FACILITY NAME	DOCKET NUMBER 05000
									FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9) 5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)									
POWER LEVEL (10) 000	20.2201(b)	20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	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 Cornelius T. Coddington - Senior Engineer, Licensing	TELEPHONE NUMBER (Include Area Code) 717 / 542-3294
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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)

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 15 single-spaced typewritten lines) (16)

This report documents two events where compliance with Action b of Technical Specification 3.9.1 could not be maintained. These events occurred on May 2, 1998, at 1040 hours and on May 5, 1998, at 0035 hours with Unit 1 in Condition 5 (Refueling) at 0 percent power. They involved the performance of required surveillance testing for the 18 Month Reactor Mode Switch Shutdown Position Function Check and the one-rod-out interlock when the one-rod-out interlock was inoperable. With the one-rod-out interlock inoperable, the current Technical Specifications do not permit the required operability testing (while in Mode 5) while meeting the Technical Specification action requirements. A previous interpretation pertaining to the interlock remaining operable with the CRD system out of service longer than the interlock's surveillance frequency was concluded to be inadequate. The proposed Improved Technical Specifications provides for the performance of the one-rod-out interlock surveillance when it is inoperable without being in noncompliance with an action statement. The one-rod-out interlock and the Mode Switch surveillances were performed successfully. Corrective actions include review and revision to the operability requirements concerning equipment out of service and determining the optimum schedule for performance of the mode switch surveillance. There were no consequences to the health and safety of the public as a result of these events since no control rods moved, other than the one withdrawn to perform the one-rod-out interlock check, as required by the design.

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

EVENT DESCRIPTION

On May 2, 1998, at 1040 hours with Unit 1 in Condition 5 (Refueling) at 0 percent power, in order to perform the 18 Month Reactor Mode Switch (EISS Code: J) Shutdown Position Function Check (a required surveillance), the Reactor Mode Switch was taken to the 'Refuel' position from the 'Shutdown' position. The Reactor Mode Switch had been locked in the 'Shutdown' position in accordance with ACTION b of Technical Specification 3.9.1 due to the one-rod-out interlock being inoperable. The one-rod-out interlock was inoperable due to its surveillance frequency being expired and the surveillance could not be performed due the Control Rod Drive (CRD) (EISS Code: AA) system being out of service. The CRD system is required to support the surveillance on the one-rod-out interlock. The 18 Month Reactor Mode Switch Shutdown Position Functional Check surveillance requires the Mode Switch to be placed in the refuel position in order to verify that a SCRAM is generated when the switch is repositioned to the shutdown position. Since the surveillance requires the Mode Switch to be taken out of the shutdown position, Technical Specification 3.9.1 Action b could not be met during the 35 minutes it took to perform the surveillance. The Mode Switch successfully passed the surveillance.

A second event where Action b of Technical Specification 3.9.1 could not be met occurred on May 5, 1998, at 0035 hours with Unit 1 in Condition 5 (Refueling) at 0 percent power. As discussed above, the one-rod-out interlock (EISS Code: J) was declared inoperable due to its surveillance frequency being expired. In order to declare the one-rod-out interlock operable when the CRD system was returned to service, the surveillance requires that the Mode Switch be placed in the refuel position and a control rod withdrawn. When the Mode Switch was placed in the refuel position for 20 minutes to perform the surveillance, the requirements of Action b of Technical Specification 3.9.1 were not met. The one-rod-out interlock successfully passed the surveillance and was declared operable.

CAUSE OF EVENT

The cause of the first event was that the surveillance interval for the one-rod-out interlock had expired prior to the performance of the Mode Switch testing. The one-rod-out interlock surveillance could not be performed due to the CRD system being out of service. The one-rod-out interlock was declared inoperable when the interpretation that it remained operable while the CRD system is out of service could not be substantiated. The Technical Specifications require that the mode switch be locked in the 'shutdown' position when the one-rod-out interlock is inoperable. In order to perform the surveillance on the Mode Switch, the mode switch must be placed in the 'refuel' position and then returned to the 'shutdown' position. When the mode switch was placed in the 'refuel' position, the Technical Specification action could not be met. A change to the schedule to perform the mode switch surveillance when the one-rod-out interlock was returned to operable status, at a later time following the return of the CRD system to service, was not recognized as being an option for testing the Mode Switch.

The root cause of the second event was that with the one-rod-out interlock inoperable (as a result of the CRD system being out of service and thus not being able to perform the one-rod-out interlock surveillances



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within the required frequency), the current Technical Specifications do not permit the required operability testing (while in Mode 5) while meeting the Technical Specification action requirements. The Technical Specifications require that the mode switch be locked in the 'shutdown' position when the one-rod-out interlock is inoperable. In order to perform the operability surveillance on the one-rod-out interlock, the mode switch must be placed in the 'refuel' position. When the mode switch was placed in the 'refuel' position, the Technical Specification action could not be met.

REPORTABILITY/ANALYSIS

In order to perform the 18 Month Reactor Mode Switch Shutdown Position Function Check (a required surveillance), the Reactor Mode Switch was taken to the 'Refuel' position from the 'Shutdown' position. The Reactor Mode Switch had been locked in the 'Shutdown' position in accordance with ACTION b of Technical Specification 3.9.1 due to the one-rod-out interlock being inoperable. The one-rod-out interlock was inoperable due to its surveillance frequency being expired and the surveillance could not be performed due the Control Rod Drive (CRD) system being out of service. The CRD system is required to support the surveillance on the one-rod-out interlock. The 18 Month Reactor Mode Switch Shutdown Position Functional Check surveillance requires the Mode Switch to be placed in the refuel position in order to verify that a SCRAM is generated when the switch is repositioned to the shutdown position. Since the surveillance requires the Mode Switch to be taken out of the shutdown position, Technical Specification 3.9.1 Action b could not be met during the 35 minutes it took to perform the surveillance. The Mode Switch successfully passed the surveillance.

A second event where Action b of Technical Specification 3.9.1 could not be met was when surveillance to declare the one-rod-out interlock operable was performed. As discussed above, the one-rod-out interlock was declared inoperable due to its surveillance frequency being expired. In order to declare the one-rod-out interlock operable when the CRD system was returned to service, the surveillance requires that the Mode Switch be placed in the refuel position and a control rod withdrawn. When the Mode Switch was placed in the refuel position for 20 minutes to perform the surveillance, the requirements of Action b of Technical Specification 3.9.1 were not met. The one-rod-out interlock successfully passed the surveillance and was declared operable.

Not meeting Technical Specification Action statement requirements is reportable in accordance with 10CFR73(a)(2)(i)(B).

There were no consequences to the health and safety of the public as a result of these events since no control rods moved other than the one withdrawn to perform the one-rod-out interlock check as required.

In accordance with the guidelines provided in NUREG-1022, Revision 1, Section 5.1.1, the required submission date for this report was determined to be June 1, 1998.



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CORRECTIVE ACTIONS

The following corrective actions have been completed:

- The one-rod-out interlock and the Mode Switch surveillances were performed successfully.
- The proposed Improved Technical Specifications (presently in NRC review) corrects the situation for the performance of the one-rod-out interlock surveillance when it is inoperable without being in noncompliance with an action statement.

The following corrective actions are to be taken:

- The interpretation for the one-rod-out interlock will be reviewed for accuracy and revised as necessary.
- The impact of declaring a system, structure or component "out-of-service" or "out-of-mode" has on the system, structure or component's surveillance testing requirements and operability will be clearly documented.
- A review of the outage schedule will be made to determine the optimum schedule for the performance of the Mode Switch Functional surveillance.

ADDITIONAL INFORMATION

Past Similar Events: None

Failed Component: None