Commonwealth Edison
Dresden Nuclear Power Station
R.R. #1
Morris, Illinois 60450
Telephone 815/942-2920

August 24, 1992

CWS LTR #92-549

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Licensee Event Report 92-27, Docket 050237 is being submitted as required by Technical Specification 6.6, NUREG 1022 and 10 CFR50.73(a)(2)(i)(b).

L. D. Gerner for 8/27/92
Charles W. Schroeder
Station Manager
Dresden Nuclear Power Station

CWS/cfq

Enclosure

cc: A. Bert Davis, Regional Administrator, Region III
NRC Resident Inspector's Office
File/NRC
File/Numerical

(ZDVR/736)

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1/1

LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1)	Docket Number (2)	Page (3)
Dresden Nuclear Power Station, Unit 2	0 5 0 0 0 2 3 7	1 of 0 3

Title (4) Failure to Sample Reactor Water Due to Tech Spec Misinterpretation

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 5 0 0 0
0 8	0 6	9 2	9 2	0 2 7	0 0	0 8	2 4	9 2		0 5 0 0 0

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)			
N		20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
0 0 3		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	Other (Specify
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	in Abstract
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	below and in
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	Text)

LICENSEE CONTACT FOR THIS LER (12)

Name	TELEPHONE NUMBER
	AREA CODE
Keith Whittum, Lead Chemist Ext. 2637	8 1 5 9 4 2 -2 9 2 0

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

CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	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 fifteen single-space typewritten lines) (16)

On August 6, 1992 at 1025 hours, with Unit 2 in Start Up at 3% rated core thermal power, it was determined that reactor coolant sampling for conductivity and chloride had inadvertently been suspended contrary to Technical Specification requirements. This had minimal safety significance because the continuous conductivity recorder data were normal and dissolved oxygen was not a concern at the existing steaming rate of greater than 100,000 pounds per hour.

The root cause of the missed sample is the misinterpretation of the technical specification due to ambiguity of the requirement. The ambiguity has to do with the use of the term "startup" as it relates to either a plant evolution in general terms or specifically to the position of the Mode Switch.

Corrective actions include a written Technical Specification interpretation of the requirement and procedure changes to reflect this interpretation.

There have been no previous events of this type.

PLANT AND SYSTEM IDENTIFICATION:

General Electric - Boiling Water Reactor - 2527 MWt rated core thermal power.

Nuclear Tracking System (NTS) tracking code numbers are identified in the text as (XXX-XXX-XX-XXXXX).

EVENT IDENTIFICATION:

A. CONDITIONS PRIOR TO EVENT:

Unit: 2 Event Date: August 6, 1992 Event Time: 1025 Hours

Reactor Mode: N Mode Name: Startup Power Level: 3%

Reactor Coolant System (RCS) Pressure: 430 psig

B. DESCRIPTION OF EVENT:

On August 6, 1992 at 1025 hours, with Unit 2 in the Start-Up mode at 3% rated core thermal power, it was determined that the reactor coolant had not been sampled for conductivity and chloride as required by Technical Specifications. The events on August 5, 1992 are as follows: Unit 2 was in Start-Up with a steaming rate of less than 100,000 pounds per hour. The Chemistry Department was requested by Operations to pull reactor water samples once-per-four-hours for conductivity and chloride beginning at 1130 hours on August 5, 1992. When the 1930 hour sample results were called to Operations, a discussion followed as to the need to continue sampling since the steaming rate was greater than 100,000 pounds per hour. After reviewing the Technical Specifications, it was decided that the requirement had been satisfied and sampling was suspended.

At 1025 hours on August 6, 1992, the day shift Station Control Room Engineer (SCRE) realized that the required samples were not being obtained and promptly suspended Start-Up and requested Chemistry to resume sampling. A sample was obtained at 1040 hours, and the results were communicated to Operations at 1216 hours. Start-Up resumed after verification that the sample results were within limits.

C. APPARENT CAUSE OF EVENT:

This report is being submitted in accordance with 10CFR50.73(a)(2)(i)(B) which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications within 30 days of the event. The root cause of the missed sample is the misinterpretation of the Technical Specification due to ambiguity of the requirement. The ambiguity has to do with the use of the term "startup" as it relates to either a plant evolution in general terms, or specifically to the position of the Mode Switch. The T.S. 4.6.C.2 words "During startups and at steaming rates below 100,000 pounds per hour" along with the Technical Specification bases leave room for misinterpretation.

TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [XX]

D. SAFETY ANALYSIS OF EVENT:

The purpose of monitoring the conductivity and chloride in reactor water is to assure that conditions do not develop which are favorable for the occurrence of Chloride Stress Corrosion Cracking (SCC) on the reactor vessel and internals. During plant startup evolutions, reactor water can contain sufficient dissolved oxygen which in conjunction with chloride and heat will accelerate SCC. When steaming rates exceed 100,000 pounds per hour during the startup evolution, the dissolved oxygen is effectively removed from the reactor water such that the SCC mechanism is stopped. During the period in which the grab samples were not obtained, the continuous conductivity recorder maximum reading was 0.1 micro-mho per centimeter. This maximum conductivity value assures that at no time was the chloride above the 0.1 ppm LCO and thereby, the conditions for accelerated SCC did not exist. Therefore, the safety significance is minimal.

E. CORRECTIVE ACTIONS:

The following corrective actions were initiated regarding this event.

1. A Technical Specification Interpretation for Section 3/4.6.C.2 will be issued by September 11, 1992 (NTS 237-200-92-15101).

2. The Operations Start Up Checklist will be changed to reflect the Technical Specification Interpretation (NTS 237-200-92-15102).

3. A memo will be sent to all SRO's on this event, and it will be followed up in the six-week operator training program to be completed by November 13, 1992 (NTS 237-200-92-15103).

4. Procedure changes will be made to Dresden Chemistry Surveillance Procedures (DCS) 6130-01, 6240-01, 6280-01 and DAP 16-05 Attachment 2, Chemistry Shift turnover sheet, to clarify the requirement in accordance with the Technical Specification Interpretation for section 3/4.6.C.2 (NTS 237-200-92-15104).

F. PREVIOUS EVENTS:

There have been no previous events of this type.

G. COMPONENT FAILURE DATA:

There were no component failures involved; therefore, an NPRDS data base search was not conducted.