



Commwealth Edison

Dresden Nuclear Power Station

R.R. #1

Morris, Illinois 60450

Telephone 815/942-2920

March 31, 1993

CWS PMLTR 93-0134

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

Licensee Event Report #91-029-01, Docket #050237 is being submitted as required by Technical Specification 6.6, NUREG 1022 and 10 CFR 50.73(a)(2)(vii)(d).

Charles W. Schroeder
Station Manager
Dresden Station

CWS/KB:slb

Enclosure

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

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LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1) Dresden Nuclear Power Station, Unit 2 Docket Number (2) 0 | 5 | 0 | 0 | 0 | 2 | 3 | 7 Page (3) 1 | of | 0 | 4

Title (4) Main Steam Line Log Radiation Monitor Setpoints Non-Conservative Due to Procedure Deficiency

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	2	19	1	9	1	0	2	9	0	0
N/A											
N/A											

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)											
POWER LEVEL (10)	0 9 6	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)(c)	<input type="checkbox"/> 73.71(c)	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input checked="" type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> Other (Specify in Abstract below and in Text)
		<input type="checkbox"/> 20.405(a)(1)(iii)	<input type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(x)					
		<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)										

LICENSEE CONTACT FOR THIS LER (12)

Name	Ken Beverly, Licensing Engineer	Ext. 2711	TELEPHONE NUMBER	8 1 5 9 4 2 - 2 9 2 0
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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)

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

On August 20, 1991, an Instrument Mechanic (IM) was performing Dresden Instrument Surveillance (DIS) 1700-1, "Unit 2 Main Steam Line Log Radiation Monitoring System Calibration." Due to an incorrect assumption and a need to respond to an Institute for Nuclear Power Operations (INPO) Evaluator, the IM transferred data from the previous month's surveillance to the data sheet for the current month. The IM that transferred the data to the data sheet could not complete the surveillance on his shift. The data sheets in the procedure are not indexed to the procedure steps and can be easily misinterpreted. The IM that continued the surveillance following shift change was not aware that the data on the data sheet was from the previous quarter and hence made no changes in the calibration constants. The root cause of this event is procedure deficiency. DIS 1700-1 contains an unclear data sheet that resulted in the wrong data being transferred from a previous quarter's surveillance. Contributing to the event was a lack of administrative controls to prevent an error from being propagated through all instrument channels once an error has been made. The safety significance of this event is minimal because the shift in the Group I isolation setpoint would have been only approximately 600 mRem/hour. DIS 1700-1 will be revised by personnel knowledgeable in the performance of the procedure to enhance the user friendliness of the procedure. In addition, the IM Department will evaluate methods of instituting additional administrative controls to ensure that errors do not propagate between instrument channels during the performance of surveillances.

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

Comparison of As-Left Setpoints with Calculated Setpoints

Alarm Calibration Data

Channel	A (mR/hr)	B (mR/hr)	C (mR/hr)	D (mR/hr)
As-Left Setpoint	4120	5420	4390	4550
Acceptable Range Maximum	3854	4986	4199	4304
Calculated Setpoint	3854	4986	4199	4304

Scram/Isolation Trip Calibration Data

Channel	A (mR/hr)	B (mR/hr)	C (mR/hr)	D (mR/hr)
As-Left Setpoint	8300	10900	8880	9290
Acceptable Range Maximum	7807	10071	8499	8707
Calculated Setpoint	7707	9971	8399	8607

C. APPARENT CAUSE OF EVENT:

This event is reportable in accordance with 10 CFR 50.73(a)(2)(vii)(d) as an event where single cause or condition caused at least on independent train or channel to become inoperable in multiple systems or two independent trains or channels to become inoperable in a single system designed to mitigate the consequences of an accident.

DIS 1700-1 contains an unclear data sheet that resulted in the wrong data being transferred from a previous quarter's surveillance.

Contributing to this event was lack of management controls to prevent an error occurring early in the performance of the surveillance from propagating through the entire procedure and from one RPS channel to the other.

D. SAFETY ANALYSIS OF EVENT:

The Technical Specification basis for the main steam line high radiation isolation and scram is to detect gross fuel failure. Discharge of excessive amounts of radioactivity to the site environs is prevented by the air ejector off-gas monitors, which cause an isolation of the main condenser off-gas line.

The monitor setpoints were approximately 600 mR/hour more than the maximum acceptable setting of approximately 9000 mR/hour. This relatively small non-conservatism would still have allowed detection of gross fuel failure in a timely manner.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Form Rev 2.0

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

In the current final safety analysis reports (FSARs), the automatic reactor shutdown on the Main Steam Line Radiation Monitor (MSLRM) trip is not given credit in the analysis of any design basis event for BWRs. The FSARs assume that the Main Steam Isolation Valves (MSIVs), on the MSLRM trip, close only in a control rod drop accident (CRDA). However, to be consistent with the requirements in the Standard Review Plan (SRP), the radioactive contents (noble gases and iodine) of the coolant resulting from the event are assumed to be transferred to the condenser and turbine before the MSIV closes.

The event was terminated when the main steam line radiation monitor hydrogen addition switches were placed in the off position. This action enforced a lower setpoint which was below the Technical Specification limit.

E. CORRECTIVE ACTIONS:

1. DIS 1700-1 will be revised by personnel knowledgeable in the performance of the procedure to index the data sheets to the procedure steps they correspond to (237-200-91-14601). Completed 4/10/92
2. The IM Department will evaluate methods of instituting additional administrative controls to ensure that errors do not propagate between instrument channels during the performance of surveillances. Possible methods of achieving this goal are: (1) modifying the schedule to assure that work on instrument channels is performed by different personnel or the same personnel but on different days (237-200-91-14602). Completed 4/10/92
3. The IM Department will be trained on this event in a tailgate session (237-200-91-14603). Completed 11/05/91

F. PREVIOUS OCCURENCES:

LER/Docket Numbers Title

A review of station records indicates no previous events.

G. COMPONENT FAILURE DATA:

No component failure occurred.

DAP FORM 2-8D
EVENT SUMMARY AND CAUSE CODES

DAP 02-08
REVISION 10

LER Number
12-2-91-029

<input type="checkbox"/>	Lost generation	<input type="checkbox"/>	Reactor trip	<input type="checkbox"/>	NRC violation, level _____
<input type="checkbox"/>	Cost > \$25,000	<input type="checkbox"/>	ESF actuation	<input type="checkbox"/>	GSEP event, class _____
<input type="checkbox"/>	Hazard or Spill	<input checked="" type="checkbox"/>	NRC reportable	<input type="checkbox"/>	Tech Spec LCO
<input type="checkbox"/>	Personnel injury	<input checked="" type="checkbox"/>	LER	<input type="checkbox"/>	Potential or future loss
		<input type="checkbox"/>	PSE	<input type="checkbox"/>	SALP functional area _____

Component type	Failure mode				Department			
X								
X								
X								

Licensed? L or blank	Level	Department				Type	Detail code
A							
A							
A							

Type	Detail code				Department
B					
B					
B					

Type	Detail code
C	

Type of deficiency	Detail code				Procedure type
D					
D					
D					

Type	Detail code				Department
E	E	I	I	M	
E					
E					