

Commonwealth Edison Company
Dresden Generating Station
6500 North Dresden Road
Morris, IL 60450
Tel 815-942-2920

ComEd

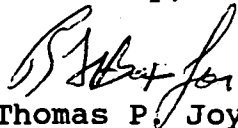
March 16, 1995

TPJLTR 95-0033

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

Licensee Event Report 95-008, Docket 50-237 is being
submitted as required by Technical Specification 6.6,
NUREG 1022 and 10CFR50.73(a)(2)(i).

Sincerely,



Thomas P. Joyce
Site Vice President

TPJ/MA:pt

Enclosure

cc: J. Martin, Regional Administrator, Region III
NRC Resident Inspector's Office
File/NRC
File/Numerical

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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 INFORMATION AND RECORDS MANAGEMENT BRANCH (MNB 7714), 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) Dresden Nuclear Power Station, Units 2 and 3

DOCKET NUMBER (2) 05000237

PAGE (3) 1 OF 4

TITLE (4) Entry Into Technical Specification 3.0.B Due to Procedure Deficiency

Table with columns: EVENT DATE (5), LER NUMBER (6), REPORT DATE (7), OTHER FACILITIES INVOLVED (8). Includes sub-columns for Month, Day, Year, Sequential Number, Revision Number, Facility Name, and Docket Number.

Table for regulatory requirements (11) with columns for Operating Mode (9), Power Level (10), and various CFR sections (20.2201(b) through 50.73(a)(2)(x)).

LICENSEE CONTACT FOR THIS LER (12) NAME: Michael S. Andjelic, Operations Staff; TELEPHONE NUMBER: (815) 942-2920

Table for component failure descriptions (13) with columns: CAUSE, SYSTEM, COMPONENT, MANUFACTURER, REPORTABLE TO NPRDS.

SUPPLEMENTAL REPORT EXPECTED (14) YES (If yes, complete EXPECTED SUBMISSION DATE); EXPECTED SUBMISSION DATE (15) MONTH, DAY, YEAR

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

On February 16, 1995 at 0407 hours with Unit 2 at 93% rated core thermal power and Unit 3 at 97% rated core thermal power, the Unit 3 Emergency Diesel Generator (EDG)[EK] was taken Out Of Service (OOS) for routine maintenance with the 2/3 "A" Standby Gas Treatment (SBGT)[BH] train inoperable. At 0650 hours, the oncoming crew identified that with the Unit 3 EDG OOS, the alternate power supply for the 2/3 "B" SBGT train was eliminated. With both trains of SBGT inoperable, both units entered into Technical Specification 3.0.B retroactive to 0407 hours. The "A" SBGT train was declared operable at 0725 hours on February 16, 1995 and both units exited Technical Specification 3.0.B. The safety significance of the event is considered minimal since the inlet and outlet damper opening time and system flow rate for the "A" SBGT system was proven to be functional 6 hours and 52 minutes prior to taking the Unit 3 EDG OOS. The "A" SBGT train would have been able to perform its function even though it was administratively declared inoperable. The root cause of the problem was attributed to Dresden Appendix X Outage Report #5 which incorrectly identified the equipment needed to be operable when the Unit 3 EDG is inoperable.

NRC FORM 366A (5-92)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95	
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 INFORMATION AND RECORDS MANAGEMENT BRANCH (MNB 7714), 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.	
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

EVENT IDENTIFICATION:

Entry Into Technical Specification 3.0.B Due to Procedure Deficiency

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 2(3) Event Date: February 16, 1995 Event Time: 0407 hours
 Reactor Mode: N(N) Mode Name: Run(Run) Power Level: 93%(97%)
 Reactor Coolant System Pressure: 922(1007) psig

B. DESCRIPTION OF EVENT:

On February 16, 1995 at 0407 hours with Unit 2 at 93% rated core thermal power and Unit 3 at 97% rated core thermal power, the Unit 3 Emergency Diesel Generator (EDG)[EK] was taken Out Of Service (OOS) for routine maintenance. The 2/3 "A" Standby Gas Treatment train (SBGT)[BH] was currently inoperable and was 6 hours and 43 minutes into a 10 hour, Station imposed, operability run in accordance with Dresden Operating Surveillance (DOS) 7500-02, SBGT System Surveillance and IST Test. At 0650 hours, during shift turnover, the oncoming crew identified that by taking the Unit 3 EDG OOS the emergency power supply for the Unit 2/3 "B" Standby Gas Treatment train was eliminated; thereby, making the "B" train of SBGT inoperable. With both trains of SBGT inoperable, both units entered into Technical Specification 3.0.B and 3.7.B retroactive to 0407 hours. At 0724 hours DOS 7500-02 was successfully completed for the 2/3 "A" SBGT and the train was declared operable. At 0725 hours on February 16, 1995, both units exited Technical Specification 3.0.B.

C. CAUSE OF EVENT:

This event 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. The immediate cause of the event was the failure to identify the Limiting Condition For Operation which the Units would be placed in prior to taking the Unit 3 EDG OOS.

The root cause for the event was attributed to an error in Dresden Appendix X, revision 9, Outage Report #5 which was reviewed prior to authorizing the Unit 3 EDG to be taken OOS. Appendix X Outage Report #5 identifies the applicable Technical Specifications and associated equipment which must be operable when the Unit 3 EDG is inoperable. The Appendix X Checklist did not identify the need to have the Unit 2/3 "A" SBGT train operable when the Unit 3 EDG is inoperable. Statements given by the Unit 3 Lead Planner, the Unit 3 Shift Manager and Unit Supervisor for the shift in which the Unit 3 EDG was taken OOS identified that Appendix X Outage Report #5 was used as part of their review in the planning and removing the Unit 3 EDG from service.

D. SAFETY ANALYSIS:

The safety significance of the event is considered minimal for the following reasons: The 2/3 "A" SBGT train was taken OOS per Equipment Checklist 950002083 at 1307 hours on February 15, 1995. Work request 29571 was initiated to remove a

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charcoal canister so that the methyl iodide removal efficiency of the "A" SBT adsorber could be determined by a vendor. A previous sample from the "A" SBT train was taken on January 24, 1995; however, the vendor reported that this sample was destroyed. Prior to any work being performed under Work Request 29571, the vendor informed the Station on February 15, 1995 that the previous sample had not been destroyed and an additional sample would not be needed. OOS 950002083 was cleared at 2050 hours on February 15, 1995. DOS 7500-03, SBT System Post Maintenance Testing, would have satisfied the requirements needed to declare the "A" SBT system operable since no work was performed on the system. The surveillance requires the opening time for the SBT train inlet and outlet dampers to be within a specified range and the system flowrate for the train being tested to equal 4000 cfm (plus or minus 10%). However, DOS 7500-02 was conservatively chosen by the previous shift to be used to determine operability of the "A" SBT train since the due date to run this monthly surveillance was February 14, 1995 and the critical date, due date plus 25% of surveillance interval, was February 19, 1995. DOS 7500-02 requires the same acceptance criteria as DOS 7500-03 along with the requirement to maintain the flowrate for 10 hours with the subsystem heaters operating at rated power.

The inlet and outlet damper opening time and the flowrate for the "A" SBT train was verified acceptable per DOS 7500-02 at 2115 hours on February 15, 1995. Therefore, per the requirements of DOS 7500-03, "A" SBT train was proven to be functional 6 hours and 52 minutes prior to taking the Unit 3 EDG OOS. If needed, the 2/3 SBT "A" train would have been able to perform its function even though it was administratively declared inoperable.

E. CORRECTIVE ACTIONS:

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

The short term corrective actions were to initiate a memo to all licensed Operating crews which described the event, the problem associated with Appendix X, and a review of Technical Specification 3.0.B. In addition, a temporary procedure change to Dresden Appendix X, Outage Report #5 was completed to identify the need to have 2/3 "A" SBT operable when the Unit 3 EDG is inoperable.

A near term corrective action is to review and revise Appendix X to identify any additional equipment which is required to be operable when a safety system is inoperable (237-180-9500801). In addition, a long term corrective action is to provide training on Technical Specification 3.0.B and its interpretation to licensed operating crews so that the problems encountered when removing an alternate power source from service can be identified (237-180-9500802).

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

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F. PREVIOUS OCCURRENCES:

A search of available station event data bases for previous occurrences associated with Dresden Appendix X identified the following event:

LER/Docket Numbers	Title
92-019/050237(249)	<p>Containment Spray Interlock Momentarily Inoperable Due to Surveillance Testing with 2/3 Diesel Generator Inoperable.</p> <p>It was discovered that the 2/3 core height containment spray interlock had been rendered inoperable for a short period of time due to a surveillance conflict.</p>

G. COMPONENT FAILURE DATA:

This event was not the result of a failed component, but rather an inability to identify a Technical Specification Limiting Condition for Operation.