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Dresden Generating Station
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ComEd

March 10, 1997

JSPLTR #97-0052

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

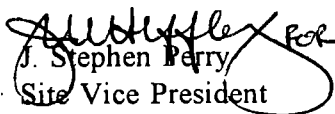
Enclosed is Licensee Event Report 97-004, Docket 50-237, which is being submitted pursuant to 10 CFR 50.73(e)(2)(i)(B) which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications..

This correspondence contains the following commitment:

1. Station procedures controlling performance of technical review will be evaluated for potential improvement. (NRS #2371809700401)

If you have any questions, please contact Pete Holland, Dresden Regulatory Assurance Supervisor at (815) 942-2920 extension, 2714.

Sincerely,


J. Stephen Perry
Site Vice President
Dresden Station

Enclosure

cc: A. Bill Beach, Regional Administrator, Region III
NRC Resident Inspector's Office

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NRC FORM 366 (5-92)		U.S. NUCLEAR REGULATORY COMMISSION			APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95									
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 (MNBB 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, Unit 2							DOCKET NUMBER (2) 050237			PAGE (3) 1 of 5				
TITLE (4) Channel Checks for ATWS Level and Pressure Instruments Performed at Incorrect Frequency due to Personnel Error during the Procedure Review Cycle.														
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				
02	08	97	97	-- 004 --	00	03	10	97	None					
OPERATING MODE (9)		1		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)										
POWER LEVEL (10)		99		20.2201(b)		20.2203(a)(3)(i)		50.73(a)(2)(iii)		73.71(b)				
				20.2203(a)(1)		20.2203(a)(3)(ii)		50.73(a)(2)(iv)		73.71(c)				
				20.2203(a)(2)(i)		20.2203(a)(4)		50.73(a)(2)(v)		OTHER				
				20.2203(a)(2)(ii)		50.36(c)(1)		50.73(a)(2)(vii)		(Specify in Abstract below and in Text, NRC Form 366A)				
				20.2203(a)(2)(iii)		50.36(c)(2)		50.73(a)(2)(viii)(A)						
				20.2203(a)(2)(iv)		X 50.73(a)(2)(i)		50.73(a)(2)(viii)(B)						
				20.2203(a)(2)(v)		50.73(a)(2)(ii)		50.73(a)(2)(x)						
LICENSEE CONTACT FOR THIS LER (12)														
NAME T. Vowels, Computerized Rounds Administrator								TELEPHONE NUMBER (Include Area Code) Ext. 3365 (815) 942-2920						
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 type-written lines) (16)

At approximately 1430 on February 8, 1997, while performing a review of the computerized rounds, Appendix D, HVO Inside Round Logsheet, the program administrator identified that channel check frequencies for the Reactor Level and Pressure failed to meet the minimum frequency stated in the Upgraded Technical Specifications. Though this condition had existed since September 8, 1996, Technical Specification non-compliance did not occur until January 13, 1997, at which time Dresden fully implemented the Upgraded Technical Specifications. The cause of the event was determined to be personnel error in the preparation of the procedural change and during the Technical Review of the procedure revision paperwork. Corrective actions include counseling of all individuals involved with the Appendix D procedure revision, a thorough review of all Operator Rounds was performed finding no additional discrepancies and revision of Appendix D on February 8, 1997, correcting the deficiency.

NRC FORM 366A (5-92)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95			
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				97	-- 004 --	00	

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

PLANT AND SYSTEM IDENTIFICATION

General Electric - boiling water reactor - 2527 Mwt rated core thermal power.

Energy Industry Identification System (EIIS) codes are identified in the text as [XX] and are obtained from IEEE Standard 805-1984, IEEE Recommendation Practice for System Identification in Nuclear Power Plants and Related Facilities.

EVENT IDENTIFICATION:

Channel Checks for ATWS Level and Pressure Instruments Performed at Incorrect Frequency due to Personnel Error during the Procedure Review Cycle.

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 2 Event Date: February 8, 1997 Event Time: 1430 hrs
 Reactor Mode: 1 Mode Name: Run Power Level: 099
 Reactor Coolant System Pressure: 1005 psig

B. DESCRIPTION OF EVENT:

This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B) which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications.

At approximately 1430, on February 8, 1997, with Unit 2 operating at 99 percent power, a periodic review of Appendix D, High Voltage Operator (HVO) Inside Round Logsheet, was found to be discrepant in the scheduled surveillance frequencies of the Recirculation Pump Trip Instrumentation. Technical Specification Table 4.2.B-1, ECCS Actuation Instrumentation Surveillance Requirements, and Table 4.2.C-1, ATWS-RPT Instrumentation Surveillance Requirements, addresses the specific ATWS system indications requiring visual Channel Checks. The required surveillance frequency, stated in the recently implemented Upgraded Technical Specifications is 1 time per shift but was found being 1 time per day, failing to meet the minimum required frequency.

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In July of 1996, the Computerized Rounds Administrator (CRA) received a matrix of instruments within the proposed Upgraded Technical Specification, the required instrument surveillance frequency, and a listing of the procedure/surveillance which performs the surveillance. The CRA performed a comparison between the current and proposed Upgraded Technical Specifications determining that the requirements within the Upgraded Technical Specifications met or exceeded the currently required frequencies for instrument monitoring, as required in the current Technical Specifications. The CRA then utilized this matrix to prepare procedure revisions for all Operator Plant Rounds in accordance with DAP 09-02, Procedure Revision Process. While performing the hardcopy revision, a note box containing a narrative explanation of the surveillance frequency was amended to indicate once every shift, but in dealing with the high volume of changes to be made, the CRA failed to perform the actual frequency change, resulting in the stated frequency remaining once per day.

The proposed procedure revision to Appendix D was routed for technical review. In all, five independent reviews were performed, each failing to detect the discrepant surveillance frequency. With the reviews completed, Appendix D was authorized for use on September 23, 1996. Though the frequency for the ATWS instruments continued to be performed once per day, no Technical Specification non-compliance occurred until January 13, 1997, when Dresden Station fully implemented the Upgraded Technical Specifications.

On February 8, 1997, a periodic review of Appendix D identified that the note box within the procedure indicated a different surveillance frequency for the Recirculation Pump Trip Instrumentation, than was actually being performed. The CRA immediately notified Station Management. The discrepancy was corrected in Appendix D, resulting in no further identified non-compliances.

Review of the daily data points which were obtained during the Operator rounds for January 12, 1997 through February 9, 1997 identified that all points were within established acceptance criteria.

This problem was verified to affect Unit 2 only, as the Unit 3 Equipment Attendant (Non-Licensed) performs these same channel checks in-plant, already being performed as a once per shift activity.

There were no systems, structures, or components inoperable at the start of this event which contributed to the event.

C. CAUSE OF EVENT:

The root cause of the event was determined to a lack of comprehensive review during the procedure Technical Review cycle (NRC cause code A, Personnel Error). Though six individuals, including the originator, had the ability to detect the procedural error, the frequency never came into question resulting in the Technical Specification non-compliance.

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YEAR	SEQUENTIAL NUMBER	REVISION NUMBER									
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TEXT (If more space is required, use additional copies of NRC Form 366A) (7)

D. SAFETY ANALYSIS:

Prior to self-identification of this event, Operations had been performing daily instrument channel checks, meeting the required frequency of the original Technical Specifications. Review of the Appendix D documentation found that all instrumentation was within tolerance for the period of January 12 1997 through February 9, 1997, showing no indication of setpoint drift. Although the surveillance interval was less than that stated in the Upgraded Technical Specifications, there is reasonable confidence that the instruments were still within calibration tolerance and would have functioned properly during an event. For this reason, the safety significance of this event is considered minimal.

E. CORRECTIVE ACTIONS:

1. The Computerized Rounds Administrator (CRA) performed a complete review of all Operator Rounds, finding no other Technical Specification non-compliances. As a result of Operations review of all Appendix changes performed for implementation of the Upgraded Technical Specifications with reference to DAP 7-40 (Equipment Operator and Attendant Rounds), and DAF 09-02 (Procedure and Review Process) it was concluded that this event was an isolated Human Performance Error. Approximately 1200 other procedures were revised as part of the Technical Specifications Upgrade Project, with no other errors of this type identified. Multiple reviews of the upgrade process were performed to prevent this type of event, and this error is a violation of the Dresden standard of 100 percent procedure adherence. (Complete)
2. Each individual who had performed part in the Technical Review of the procedure was counseled by Operations, now understands their part in the overall event, and has amended their performance. Additional review of this event is also being conducted, as shown in corrective action 4 below. (Complete)
3. Appendix D, High Voltage Operator Inside Round Logsheet, was revised on February 8, 1997, to require performance of the instrument channel check once per shift. (Complete)
4. Station procedures controlling performance of technical review will be evaluated for potential improvement. (NTS #2371809700401)

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F. PRIOR SIMILAR OCCURRENCES:

<u>LER/Docket Numbers</u>	<u>Title</u>
96-010/05000237	Tritium Analysis Requirement Exceeded Due to Chemistry Management Personnel Error
96-003/05000249	Non-Routine Sample Time Requirement Exceeded Due to Chemistry Technician Personnel Error
96-007/05000249	Failure to Perform Surveillance During Unit Shutdown Due to Personnel Error Concerning Poor Communications

G. COMPONENT FAILURE DATA:

Not applicable.