

NRC FORM 366 (5-92)			U.S. NUCLEAR REGULATORY COMMISSION			APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95				
LICENSEE EVENT REPORT (LER)										
FACILITY NAME (1) Dresden Nuclear Power Station, Unit 3						DOCKET NUMBER (2) 05000249		PAGE (3) 1 OF 8		
TITLE (4) Preconditioning Station Battery Prior To Modified Performance Test Inconsistent with Technical Specification Bases Caused by Personnel Error										
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
04	19	97	97	005	01	07	01	97	None	
									FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
			20.2201(b)			20.2203(a)(3)(i)			50.73(a)(2)(iii)	73.71(b)
POWER LEVEL (10)		000	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 D. Spencer, Plant Engineering						TELEPHONE NUMBER (Include Area Code) Ext. 3292 (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 typewritten lines) (16)

On April 19, 1997, at approximately 0300, with all fuel removed from Unit 3 vessel for refueling outage (D3R14), Dresden maintenance and engineering personnel attempted a Modified Performance Test (MPT) on the Unit 3 250VDC battery to satisfy Technical Specification requirements. The test was performed after completion of maintenance which subsequently was determined to be preconditioning. Although the preconditioning was not sufficient to invalidate the MPT, it is inconsistent with the bases of the Technical Specifications.

The cause of this event is personnel error. Corrective actions to be taken include procedure revisions, personnel training and personnel discipline. This event is being reported under 10CFR50.73(a)(2)(i)(b). The safety significance of this event was minimal.

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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.

DC Power System - Class 1E [EJ]

EVENT IDENTIFICATION:

Preconditioning Stationary Battery Prior To Modified Performance Test
Inconsistent with Technical Specification Bases Caused by Personnel Error

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 3 Event Date: 04/19/97 Event Time: 0300

Reactor Mode: none Mode Name: No Mode Power Level: 0%

Reactor Coolant System Pressure: 0 psig

B. DESCRIPTION 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 Technical Specifications.

On April 19, 1997, at approximately 1000, with all fuel removed from Unit 3 vessel for refueling outage (D3R14), Dresden Electrical Maintenance and Plant Engineering personnel (non-licensed) attempted a Modified Performance Test (MPT) on the Unit 3 250VDC battery to satisfy Technical Specification requirements. The test was performed after completion of maintenance which subsequently was determined to be preconditioning. Although the preconditioning was not sufficient to invalidate the MPT, it is inconsistent with the bases of the Technical Specifications.

In 1995, IEEE-450 "Maintenance, Testing and Replacement of Vented Lead Acid Batteries for Stationary Applications" was revised to allow the performance of an MPT. The MPT combines the battery Service test and the Performance test. In 1996, the Upgraded Technical Specifications which included the MPT was approved, and was then implemented in January 1997.

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Section 3/4.9.C of the Dresden Technical Specification bases states that "a MPT is a test of the battery capacity and the battery's ability to meet the loads that exceed the constant current discharge rate of the battery (high rate short duration loads) of the battery's duty cycle. This test satisfies the requirements of both a Service test and a Performance test..." The bases also states that "a battery Service test is a special test of the battery's capability "as found" to satisfy the design requirements of the D.C. electrical power system." Therefore, the MPT should be performed on a battery in the as found condition. Preconditioning is defined as any activities that would affect the results of the test. This is consistent with the recommendations of standard IEEE 450-1995.

Event Chronology

On April 26, 1996, anticipating the adaption of the Upgraded Technical Specifications, the System Engineer (non-licensed) removed the 250VDC battery Service test from the D3R14 maintenance schedule because credit can be taken for a Service (and Performance) test when performing the MPT. Additionally, the System Engineer re-scheduled battery maintenance work originally scheduled to follow the Service test to prior to the MPT. He mistakenly believed that the MPT prerequisites were the same as the Performance test prerequisites which allows maintenance/preconditioning prior to performing the test.

On August 6, 1996, the MPT procedure was issued. This procedure was reviewed by the System Engineer and a second System Engineer (non-licensed). MPT procedure contained the prerequisite to perform the MPT with the 250VDC battery in the as-found condition and a recommendation to perform an equalization charge in the limitations and action section. These actions are in conflict and the equalization charge violates the technical specification bases, but they were not identified during the review.

During routine inspections of the 250VDC battery in late 1996, it was identified that numerous post seals were leaking and needed to be replaced. In addition, the post seals on cell number 48 could not be repaired and the cell needed to be replaced. In accordance with IEEE standard 450-1995, these corrective actions could be implemented as soon as the problems were identified. However, due to the availability requirements of the 250VDC battery, maintenance could not be performed until the next refuel outage (D3R14) when the battery would be taken Out-of-Service for testing. This work was improperly scheduled by the System Engineer to be performed prior to performing the MPT, during D3R14.

Based on guidance provided by the System Engineer, the battery was given a 222 hour equalize charge starting on April 3, 1997, in anticipation of conducting an MPT, and was completed on April 12, 1997. The System Engineer and Maintenance personnel believed that the MPT used the same prerequisites as a Performance test because the test title used the terminology "Performance". In addition, the MPT procedure erroneously recommended that equalization charge be performed.

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On April 10, 1997, during a review of the MPT procedure, prior to performing the test or battery maintenance, the as-found prerequisite was identified by the Work Analyst/ DC Window Manager (WA) (non-licensed). The WA anticipated that the battery maintenance that was to be performed would violate the as-found prerequisite. The WA contacted the former System Engineer, who, by default, was acting as an Electrical Maintenance First Line Supervisor, to resolve the issue. The System Engineer by this time was leading, and making the decision for the MPT.

The System Engineer attempted to have the MPT procedure revised to remove the as-found prerequisite, but the Maintenance procedure writer (non-licensed) refused because the as-found requirement was contained in the IEEE standard and the Technical Specification's bases. The System Engineer then contacted Corporate Engineering to resolve the issue and Corporate Engineering responded with letter dated April 14, 1997. The letter stated in part, because sufficient maintenance was required on the battery and since a cell was being replaced, it was prudent to perform the test after all maintenance had been completed and an equalize charge had been received.

The Corporate Engineering view of the April 14, 1997, letter was to provide technical information concerning the MPT, not regulatory or administrative requirements of the Site. However, Station personnel viewed this letter as the authorization to proceed with the maintenance prior to performing the MPT, without properly revising the procedure or gaining regulatory relief.

The Electrical Maintenance Outage Plan Superintendent (non-licensed) was notified that the MPT discrepancy log would document not meeting the as-found requirement and the test would continue based on the Corporate Engineering letter and the System Engineer's recommendation. However, this was/ is in violation of the procedure adherence procedure and work package procedure.

Battery maintenance started on April 15, 1997, and was completed on April 19, 1997. On April 18, 1997, a Problem Identification Form (PIF) was written identifying that the maintenance and equalization charge was performed on the 250 VDC battery, violating that the MPT procedure's prerequisite for testing in the as-found condition and the technical specification bases. No attempt was made to contact regulatory assurance for guidance. This was a missed opportunity to gain regulatory relief prior to starting the MPT. Work proceeded and an initial attempt at performing the MPT was made on April 19, 1997. The MPT was re-started on April 21, 1997, and then completed on April 22, 1997, in violation of the as-found prerequisite.

C. CAUSE OF EVENT:

The root cause of this event is personnel error (NRC cause code A), inadequate technical review. The System Engineer (non-licensed) assumed the MPT prerequisites were the same as the Performance test and did not verify this with the Technical Specification's bases, MPT procedure or through sufficient review of IEEE 450 (procedural). Thus, when scheduling the battery maintenance and equalization charge, he improperly scheduled the maintenance prior to performing the MPT. Additionally, during reviews of the MPT procedure, the System Engineers did not identify the procedural errors and missed an opportunity to resolve the precondition issue prior to testing (cognitive).

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In addition, Electrical Maintenance and Engineering personnel did not sufficiently question performing the procedure without meeting the as-found prerequisite. They accepted the Engineering letter as the authority to proceed with the MPT, in violation of station procedures, without a procedure revision. This resulted in performing the MPT procedure without properly revising the procedure and gaining regulatory relief from the as-found prerequisite (procedural).

Additionally, a lack of Electrical Maintenance ownership of the MPT resulted in the System Engineer acting as the First Line Supervisor.

The contributing cause of this event is Management deficiency (NRC cause code E). The interface (Plant Engineering/Maintenance) policy and expectations which prohibits the System Engineer from acting as a Maintenance First Line Supervisor were not sufficiently implemented. During the MPT, a System Engineer acted as the Supervisor for the job. This lead to complacency and a lessening of a questioning attitude by maintenance personnel because they have the "expert" leading the job.

D. SAFETY ANALYSIS:

Per the IEEE requirements, necessary maintenance can and should be performed on a battery as necessary when a detrimental condition is found. As such, the post seal repairs as well as the cleaning and retorquing of the intercell connectors performed just prior to the MPT could have been performed in 1996 when these problems were first identified. This maintenance would not be considered as pre-conditioning the battery or affecting the results of the MPT. Furthermore, a comparison of the as-found to the as left intercell connection resistances indicates that the remake of the intercell connections changed the overall resistance of the battery connections by only 120-150 micro-ohms. During the first minute high rate, the change in resistance would affect the terminal voltage by about 0.15 volts out of 217.4 volts measured and a minimum acceptable voltage of 210 volts. During the long duration current of 273 amperes, the change in resistance would affect the terminal voltage by about 0.04 volts. Since the test was stopped due to potential cell reversal with a 212 volt terminal voltage, the change in resistance did not change the acceptability of the results.

Per the IEEE standard, the battery is to be tested in the as-found condition which would preclude the use of an equalize charge prior to the test. However, a review of the charge given to the battery prior to the test indicates that the voltage used (2.25VPC) was within the float range for these cells (2.20 - 2.25 VPC). A generally accepted equalize voltage is 2.33 to 2.39 VPC. Lower voltages may be listed in vendors operation manuals, but all vendors specify the use the highest voltage allowed by the system, and if a lower voltage doesn't work the vendor recommends that a higher voltage be used. Therefore, although the charge voltage was increased prior to the test, the increased voltage would not significantly affect the battery's performance during the test.

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Lack of preconditioning is evidenced by comparing the last quarterly voltage readings taken on March 26, 1997, to the pretest readings taken on April 18, 1997, after the equalize charge was complete. The average cell voltage on both dates is 2.20 Vdc. Also, the range of voltages on the quarterly reading was 0.09 Vdc (2.16 to 2.25, with one outlier at 2.29) while the range of pretest voltages was 0.08 Vdc (2.15 to 2.23). After an equalize charge, the differential between cell voltages is expected to be much less, on the order of 0.04 Vdc. This is shown by the cell voltages taken on April 25, 1997, after completion of a true equalize charge at 2.39 volts per cell. The average cell voltage was 2.22 Vdc and the cells were more tightly grouped around that average. The range of voltages on that date is 0.04 Vdc (2.19 to 2.23) with only three cells at the low end and seven cells at the high end.

Review of Test Results

The battery passed the modified performance test at 101% with an acceptance criteria of 80%. This result is conservative because the test had to be stopped prior to the battery terminal voltage reaching 210 Vdc. The test was stopped because the new cell (# 48) was approaching cell reversal voltage of 1.00 Vdc. At the time the test was stopped, terminal voltage was 212.8 Vdc. The new cell had been received from the vendor and was to be given a freshening charge per the vendor's instructions. However, a review of work package indicates that the freshening charge was stopped prematurely. The cell did perform at approximately 97% which is acceptable. Also, a review of the post test cell data indicates that the cell is within the acceptable float voltage range with the other cells.

Conclusions

The prerequisite of performing the test in the as-found condition was not met in that an attempt to precondition the battery (equalizing charge) was made prior to the test. However, from a technical basis, as summarized below, the activities prior to the test did not bias the test results and the test is considered valid.

The voltage used to equalize the battery was insufficient to provide a true equalize charge as the voltage used was only on the high side of the float range. Cell voltages from the prior quarterly surveillance and the readings taken prior to the test indicate that the equalize voltage used did not significantly precondition the battery.

The maintenance on the post seals resulting in remaking connections did not significantly change the intercell connection resistance. Also, the replacement of cell #48 lowered the battery test results due to improper freshening charge. Therefore, based on the above, the maintenance actions performed on the battery prior to the modified performance test did not precondition the battery to obtain a better result.

Based on the above conclusions, the safety consequences of this event were minimal.

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E. CORRECTIVE ACTIONS:

The MPT test documentation was reviewed to assure an acceptable test in accordance with Station procedures on Operability Evaluations. (complete)

The System Engineer and second procedure Technical reviewer (System Engineer) will be disciplined in accordance with station policy. (2491809700501S1)

The MPT First line Supervisors, Superintendent of Outage Planning, and Work Analyst will be disciplined in accordance with station policy. (2491809700502S1)

Procedure DES 8300-20 (MPT procedure) will be revised to reflect proper sequencing of maintenance as well as instructions concerning as-found and preconditioning issues. (2491809700501)

Station battery testing and maintenance procedures will be reviewed to verify proper instructions concerning as-found requirements and preconditioning issues. (2491809700502)

A sample review of completed Electrical Maintenance work packages will be performed to verify compliance with Station policy concerning development and revisions to the packages. (2491809700503)

The last 250VDC and 125VDC battery discharge tests will be reviewed to verify compliance with as-found requirements and preconditioning issues. (2491809700504)

A sample review of Engineering letters will be performed to verify compliance with Station policy concerning development and revisions to procedures and work packages. (2491809700505)

The Maintenance Manager provided a letter to all Maintenance Department Personnel reiterating the Station's procedure adherence requirements. (complete)

The Site Engineering Manager provided a letter to all site Engineering Personnel communicating that no Technical Evaluations (Engineering Correspondence) should be construed as authority to omit an existing procedure step or to circumvent an administrative process, and standards for procedural adherence. (complete)

Plant Engineering personnel were coached on engineering standards concerning system bases knowledge, procedure development and review, maintenance first line supervision, and regulatory compliance. (complete)

The Electrical Maintenance and Plant Engineering Superintendent will present a coaching session to the Plant Engineering Group leads and Electrical Maintenance First line Supervisors on the interface agreement, including that a System Engineer is not to act as a First Line Supervisor. (2491809700503S1A&B)

This event will be presented during an Engineering Support Personnel Training class. (2491809700504S1)

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F. PREVIOUS OCCURRENCES:

LER/Docket Number Title

97-004/05000237 Channel Checks for ATWS Level and Pressure Instruments
Performed at Incorrect Frequency due to Personnel Error during the Procedure Review Cycle

In this event, a procedure did not contain the proper testing frequency. This problem was not identified during the procedure's technical review. The corrective actions focused on the specific event and would not have prevented the event currently being reported.

97-007/0500249 Preconditioning Stationary Battery Prior To Service Test
Inconsistent with Design Bases Caused by Personnel Error

In this event, the procedure governing the Service test on the Unit 3 125VDC Alternate Battery did not contain the proper prerequisites. This event was discovered after the event currently being reported, thus, the corrective actions could not have prevented the current event.

G. COMPONENT FAILURE DATA:

There is no component failure identified with this event; therefore, this section is not applicable.