

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), 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) 05000237	PAGE (3) 1 of 4
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TITLE (4)
Drywell High Radiation Monitor Channel Functional Test Inadequate due to Inadequate Technical Review of Procedure During TSUP Implementation

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
10	12	98	98	016	00	11	11	98	Dresden Unit 3	05000249
									FACILITY NAME	DOCKET NUMBER
									N/A	N/A

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)(2)(v)	X	50.73(a)(2)(i)	50.73(a)(2)(viii)				
		20.2203(a)(2)(i)	20.2203(a)(3)(i)		50.73(a)(2)(ii)	50.73(a)(2)(x)				
		20.405(a)(1)(ii)	20.2203(a)(3)(ii)		50.73(a)(2)(iii)	73.71				
		20.2203(a)(2)(ii)	20.2203(a)(4)		50.73(a)(2)(iv)	OTHER				
		20.2203(a)(2)(iii)	50.36(c)(1)		50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A				
		20.2203(a)(2)(iv)	50.36(c)(2)		50.73(a)(2)(vii)					

LICENSEE CONTACT FOR THIS LER (12)

NAME R. A. Kelly, Regulatory Assurance	TELEPHONE NUMBER (include Area Code) (815) 942-2920 ext. 2924
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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	X	NO						
(If yes, complete EXPECTED SUBMISSION DATE)								

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

On October 12, 1998, with both units at full power, a review of Dresden Instrument Surveillance (DIS) 1600-16, "Drywell High Radiation Monitor Group 2 Isolation Functional and Calibration Tests," for on-line performance, discovered that the full channel functional test performed by Dresden Operating Surveillance (DOS) 1600-21, "Drywell High Radiation Monitor Channel Functional Test," did not meet the monthly test requirement. This is a violation of Technical Specification Table 4.2.A-1 Item 1c and Section 1.0, which requires that the complete channel be tested. A review of the procedure histories revealed that the DOS was created as a result of the Technical Specification Upgrade Project to perform the full channel functional test on a monthly basis.

The root cause of the event was determined to be an inadequate technical review of the DOS, which resulted in the failure to completely test the entire channel for the drywell high radiation monitor. Corrective actions included the revision of both procedures to allow performance of the full channel functional test. Also, the ComEd Nuclear Operations Notification process has been strengthened. A review of Instrument Maintenance Department (IMD) and Operation Surveillances was performed to determine whether any similar situations existed with none found. This event is being reported pursuant to 10 CFR 50.73(a)(2)(i)(B).

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

As a result, the full channel functional test was not performed during the execution of the DOS as required by Section 1.0 of the Technical Specifications.

At the time of discovery, Dresden Station contacted Quad Cities Nuclear Power Station (Docket Numbers 05000254 and 05000265) to determine whether this issue affected those units. It was discovered that during the Quad Cities TSUP implementation, it was identified that the full channel functional test could not be achieved with the logic configuration of the Sorento Electronics, Inc. High Radiation Monitor Model Number RP-2C. Quad Cities, through authorization from the vendor, disabled the trip inhibit capability of the monitor which would allow the Group 2 isolation contacts to fall out and achieve the isolation signal. As such, this allowed the full channel functional test to be achieved. Communication between the two stations, during their coincident TSUP implementation processes, was weak regarding specific procedural questions. As a result, no formal documentation of notification for this could be found. This has been identified as a missed opportunity for Dresden Station.

C. CAUSE OF EVENT:

The primary cause of this event has been determined to be an inadequate technical review (NRC Cause Code A) of DOS 1600-21, "Drywell High Radiation Monitor Channel Functional Test." This procedure was developed in accordance with the Technical Specification Procedure Matrix utilized during the TSUP implementation. Although the operation of the logic circuitry was identified in the DOS, the review failed to ensure that all requirements of the full channel functional test were satisfied.

A contributing cause to this event was the inadequate communication between Dresden and Quad Cities Nuclear Stations (NRC Cause Code E) regarding the development of the monthly full channel functional test. The lost opportunity to capture the knowledge gained at Quad Cities regarding the modification made to their radiation monitor prevented Dresden from properly developing the full channel functional test.

D. SAFETY ANALYSIS

The overall safety significance of this event is minimal. Upon identification, appropriate procedure revisions were made to allow the full channel functional test to be performed satisfactorily within twenty-four hours of identification. Additionally, the full channel functional test has been satisfactorily performed during the calibration frequency with no deviations noted.

E. CORRECTIVE ACTIONS:

Procedures DIS 1600-16, "Drywell High Radiation Monitor Group 2 Isolation Functional and Calibration Tests," and procedure DOS 1600-21, "Drywell High Radiation Monitor Channel Functional Test," were revised to allow performance of the required full channel functional test within twenty-four hours of discovery. (Complete)

A review of all IMD procedures revised during TSUP to perform testing of new TSUP requirements was conducted to determine whether any other non-compliance issues exist. None were identified. (Complete)

A review of Operational Channel Functional Test Procedures was performed to determine if any other situations of the failure to generate an alarm and/or trip signal existed. None were identified. (Complete)

A review of Quad Cities Nuclear Operation Notifications (NONs) initiated in 1996, 1997 and 1998 was performed to determine if any other possibilities of missed opportunities existed. None were identified. (Complete)

The ComEd NON process has been strengthened through the development of a Nuclear Station Procedure (NSP) NSP-AP-4004, "Corrective Action Program Procedure," to provide guidance and instruction for identifying, preparing, issuing and reviewing NONs for applicability. This procedure has been issued. (Complete)

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

F. PREVIOUS OCCURRENCES:

A review of Dresden Station LERs was performed with the following items identified concerning the performance of TSUP surveillance at an inappropriate frequency.

LER 2-97-004, Channel Checks for ATWS Level and Pressure Instruments Performed at Incorrect Frequency Due to Personnel Error During the Procedure Review Cycle.

LER 2-97-009, Source Range Monitor Surveillance Performed at Incorrect Frequency Due to Human Error During Technical Specification Upgrade Project.

LER 2-98-014, Reactor Building to Suppression Chamber Vacuum Breakers were not Surveilled in Accordance with Technical Specification Surveillance Requirements Due to Ambiguity in the Plant's Licensing Bases.

A review of corrective actions associated with these occurrences would not have prevented the event described in this report.

In addition to this review, a search of the INPO OPEX database was performed on the key words technical specification and surveillance. From this search over 1000 occurrences were observed. Based upon the results of the procedure reviews at Dresden, further review of these events would not add value to this report.

G. COMPONENT FAILURE DATA:

<u>Manufacturer</u>	<u>Nomenclature</u>	<u>Model/ Part Number</u>
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N/A