

LICENSEE EVENT REPORT (LER)

Facility Name (1) Dresden Nuclear Power Station, Unit 3 Docket Number (2) 0 5 | 0 | 0 | 0 | 2 | 4 | 9 Page (3) 1 | of | 0 | 3

Title (4) Fire Stop 18 Month Surveillance Interval Exceeded Due to Procedural 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	9	3	0	8	7	8	7	0	1	8	0	0	1	0	2	6	8	7	N/A	0	5	0	0	0	1	1
										N/A	0	5	0	0	0	1	1									

OPERATING MODE (9) N

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)

<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)	<input type="checkbox"/> 73.71(c)
<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> Other (Specify
<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	in Abstract
<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	below and in
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)	Text)

LICENSEE CONTACT FOR THIS LER (12)

Name Robert J. Whalen TELEPHONE NUMBER 8 1 | 5 | 9 4 | 2 | - | 2 | 9 | 2 | 0
Mechanical Systems Group Leader (X-462)

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)

Yes (If yes, complete EXPECTED SUBMISSION DATE) NO

Expected Submission Date (15) _____

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

At 1600 hours on September 30, 1987, with Dresden Unit 3 at 37% power, it was found that Dresden Fire Protection Procedure (DFPP) 4175-3, Shutdown Fire Stop/Break Surveillance, was incorrectly classified in the surveillance program as due each refueling outage. Performance of this surveillance is required on an 18 month interval by Technical Specification 4.12.F.1. A review of the past surveillance history identified that a previous surveillance interval was exceeded in November 1985 due to this procedural deficiency. Current surveillances were performed within the required interval. Since the reactor was in an extended refueling outage at the time of the exceeded interval, the event was of minimal safety significance. Corrective actions included a review of all surveillances against the appropriate Technical Specification surveillance interval. A change was also made to the surveillance program procedure such that DFPP 4175-3 is identified as requiring performance on an 18 month interval. A previous occurrence involving exceeding a surveillance interval is reported by LER #87-27 on Docket #050237.

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TEXT

PLANT AND SYSTEM IDENTIFICATION:

General Electric boiling water reactor - 2527 MWt rated core thermal power. Energy industry identification systems (EIIS) codes are identified in the text as [XX].

EVENT IDENTIFICATION:

Fire Stop 18 Month Surveillance Interval Exceeded Due to Procedural Deficiency.

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 3 Event Date: September 30, 1987 Event Time: 1600 hours
 Reactor Mode: N Mode Name: Run Power Level: 37%
 Reactor Coolant System (RCS) Pressure: 937 psig

B. DESCRIPTION OF EVENT:

At 1600 hours on September 30, 1987, with Dresden Unit 3 operating at 37% rated thermal power, a review of upcoming surveillances was being performed when Dresden Fire Protection Procedure (DFPP) 4175-3, Shutdown Fire Stop/Break Surveillance, was identified as being incorrectly classified as an operating cycle surveillance in the computer data base which is used to schedule upcoming surveillances. Performance of DFPP 4175-3 involves an inspection of fire stops and fire breaks associated with Appendix A to BTPCMEB 95-1 and Appendix R to 10 CFR 50 requirements. Technical Specification 4.12.F.1 requires these fire stops/breaks to be surveilled on an 18 month interval.

A review of the past surveillances history was conducted which revealed that a surveillance due 11/1/85 was not completed until 4/24/86, although the current surveillances were in compliance with the 18 month interval requirement.

C. APPARENT CAUSE OF EVENT:

This event is being reported to comply with Title 10 of the Code of Federal Regulations Part 50.73(a)(2)(i)(B), which requires the reporting of any deviation from the plant's Technical Specifications. The Dresden Technical Specifications (Section 4.12.F.1) require that the fire barrier penetrations be inspected once every 18 months. The procedure covering this inspection, DFPP 4175-3, was found to be incorrectly identified in the surveillance computer as needing to be performed once per operating cycle (during each refueling outage). The past surveillances using this procedure were then reviewed against the 18 month surveillance interval requirement. Using this criteria, a previous surveillance due 11/1/85 was not completed until 4/24/86. Due to the misclassification of the surveillance, the cognizant Technical Staff Engineer believed the Technical Specification requirement was fulfilled if the surveillance was completed prior to the startup of Unit 3. (Unit 3 was in an extended refueling outage during this period.) The root cause for the missed surveillance was determined to be procedural deficiency in that the surveillance program was requiring performance of the surveillance each refueling outage rather than on an 18 month interval.

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TEXT

D. SAFETY ANALYSIS OF EVENT:

There were no safety consequences because of the exceeded surveillance interval because Unit 3 was in an extended refueling outage during this period. The fire stops are designed to protect redundant trains of safety related equipment. Since the unit was in cold shutdown, a fire which could damage the redundant divisions would not cause additional risk to public health or safety.

E. CORRECTIVE ACTIONS:

Immediate corrective actions included a review of all Technical Specification surveillances which are presently tracked on a refueling outage basis in order to verify that no other surveillance intervals had been exceeded due to this type of problem, and to determine if these should be tracked on a fixed interval. In addition, DFPP 4175-3 was reclassified in the surveillance computer to have a surveillance interval of 18 months. To aid in scheduling of upcoming surveillances, a weekly list will be issued to the appropriate station personnel which identifies near term surveillance due dates.

F. PREVIOUS OCCURRENCE:

The last occurrence of a missed Technical Specification surveillance is documented by Licensee Event Report No. 87-027-00 on Docket #050237, Failure to Perform Technical Specification Surveillance Within the Required Time Period Due to Personnel Error.

G. COMPONENT FAILURE DATA:

Since no component failures were associated with this event, this section is not applicable.



Commonwealth Edison

Drasden Nuclear Power Station

R.R. #1

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Telephone 815/942-2920

October 26, 1987

EDE LTR #87-716

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

Licensee Event Report #87-018-0, Docket #050249 is being submitted as required by Technical Specification 6.6, NUREG 1022 and 10 CFR 50.73(a)(2)(i)(B).

E.D. Eenigenburg
Station Manager
Dresden Nuclear Power Station

EDE/kjl

Enclosure

cc: A. Bert Davis, Regional Administrator, Region III
File/NRC
File/Numerical

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