Commonwealth Edison
Dresden Nuclear Power Station
R.R. #1
Morris, Illinois 60450
Telephone 815/942-2920

July 6, 1989

EDE LTR #89-520

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

Licensee Event Report #89-017-0, Docket #050237 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/ade

Enclosure

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

(0608k)

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LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1)	Docket Number (2)	Page (3)
Dresden Nuclear Power Station, Unit 2	0 5 0 0 0 2 3 7	1 of 0 4

Title (4)

Loss of Batch Waste Release Tank Composite Sample Due to Management 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 6	0 8	8 9	8 9	0 1 7	0 0	0 7	0 6	8 9	Dresden Unit 3	0 5 0 0 0 2 4 9
									N/A	0 5 0 0 0

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)					
N		20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)		
POWER LEVEL (10)	0 8 8	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)		
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	Other (Specify in Abstract below and in Text)		
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)			
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)			
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)			

LICENSEE CONTACT FOR THIS LER (12)

Name	TELEPHONE NUMBER
John Reid, Technical Staff Engineer Ext. 2334	AREA CODE 8 1 5 9 4 2 - 2 9 2 0

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)		Expected Submission Date (15)	Month	Day	Year
Yes (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

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

At 1300 hours on June 8, 1989, with Unit 2 at 88% power and Unit 3 at 90% power, the May 1989 Batch Waste Release Tank composite sample for Tritium and gross alpha was inadvertently discarded before a sample aliquot could be sent off-site for analysis. This monthly composite sample is required by Technical Specification Table 4.8.3. The cause of this event was attributed to management deficiency on the part of the Chemistry Department personnel. This event was initially reviewed with the personnel involved and will be reviewed with all Chemistry Department personnel. The Chemistry Department is implementing improved administrative controls concerning these samples, and a comprehensive Chemistry procedure upgrade program is in progress.

The safety significance of this event was minimal since all tanks discharged during May 1989 were sampled and analyzed for gross activity, and gamma isotopic Maximum Permissible Concentration (MPC) fractions were verified to be satisfactory.

A previous event involving a Chemistry surveillance was reported by LER 88-014-0 on Docket Number 050237.

PLANT AND SYSTEM IDENTIFICATION:

General Electric - Boiling Water Reactor - 2527 MWt rated core thermal power.

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

EVENT IDENTIFICATION:

Inadvertent discarding of May 1989 Batch Waste Release Tank composite sample prior to off-site vendor analysis due to management deficiency.

A. CONDITIONS PRIOR TO EVENT:

Unit(s): 2 (3) Event Date: June 8, 1989 Event Time: 1300 hours

Reactor Mode(s): N (N) Mode Name(s): Run (Run) Power Level(s): 88% (90%)

Reactor Coolant System (RCS) Pressure(s): 995 psig (995 psig)

B. DESCRIPTION OF EVENT:

On June 8, 1989 at 1300 hours with Unit 2 and Unit 3 in the Run modes at 88% and 90% power respectively, the May 1989 Batch Waste Release Tank [WD] composite sample for Tritium and gross alpha was inadvertently discarded before a sample aliquot could be sent off-site for analysis. During cleanup of the Chemistry laboratory, a Chemistry Technician (CT) asked a Chemistry Foreman (CF) if he could discard stored samples sitting on the laboratory balance table.

The CF, who was busy working on the laboratory Ion Chromatograph (IC), gave the CT permission to discard the samples. The CF thought the CT was referring to Low Pressure Coolant Injection (LPCI) [BO] samples for May (which had already been analyzed), and did not request the CT to identify which samples he was referring to. Consequently, the May 1989 Batch Waste Release Tank composite sample was inadvertently discarded along with the LPCI samples. On June 9, 1989 while preparing the monthly samples for shipment off-site for vendor analysis, another CT could not locate the May Batch Waste Release Tank composite sample. An investigation was conducted and the CT assigned the job of cleaning the laboratory the previous day stated that he had discarded the May Batch Waste Release Tank composite sample (with other samples after receiving permission from the CF).

There were no related maintenance activities or testing in progress at the time of this event. No systems or components contributed to this event.

C. APPARENT CAUSE OF EVENT:

This report is being submitted in accordance with 10 CFR 50.73(a)(2)(i)(B) which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications within 30 days of the event. The root cause of this event was management deficiency due to the CF giving permission to discard samples without properly verifying which samples were being discarded. This event involved cognitive (failure to recognize condition) error on the part of the CF. An intermediate cause was the fact that no formal procedure governing these samples or for shipping the samples to off-site vendors was provided. In addition, these samples are not presently segregated from the general sample population.

D. SAFETY ANALYSIS OF EVENT:

The safety significance of the event was minimal since all tanks discharged during May 1989 were sampled and analyzed for gross activity, and gamma isotopic Maximum Permissible Concentration (MPC) fractions were verified to be satisfactory in accordance with Dresden Operating Procedure (DOP) 2000-28, Radioactive Waste Discharges. Tritium concentration in gaseous effluents during May 1989 show expected normal levels of activity. Alpha and gamma activities in the Batch Waste Release Tanks during May 1989, and Tritium analysis on April 1989 samples, and the sample for June 1, 1989 through June 8, 1989 all show expected normal levels of activity. Since gaseous effluent Tritium did not increase during May, and all other analyses indicate expected normal activity levels, there is no reason to suspect that the May 1989 Tritium sample was outside expected ranges. If this event had occurred under a more severe set of initial conditions, the safety consequences would still have been minimal because analyses required by DOP 2000-28 would have identified the increased levels of activity and would have prohibited the discharge.

E. CORRECTIVE ACTIONS:

The following corrective actions were initiated regarding this event.

1. This event was reviewed with the personnel involved and will also be included in the periodic tailgate meeting material to be reviewed with all Chemistry Department personnel (237-200-89-08801).

2. The Chemistry Department is in the process of implementing a 28 day surveillance activity schedule and development of new Chemistry Department Surveillance sheets to document all CT duties to be performed during the cycle (237-200-89-08802).

3. The Chemistry Department will implement procedures for the storage, handling, and shipping of the Batch Waste Release Tank composite samples. The procedures shall include shipping schedules as well as instructions for preparing the shipment and safeguards to ensure that the sample is not discarded prior to shipment. These sample requirements will also be added to the surveillance tracking program (237-200-89-08803).

4. The Chemistry Department is implementing a dedicated storage area for samples requiring off-site analysis (237-200-89-08804).

5. The Chemistry Department is also continuing implementation of an ongoing comprehensive upgrade of the entire sequence of Chemistry Surveillance Procedures (237-200-89-08805).

F. PREVIOUS EVENTS:

A previous event involving a Chemistry Department surveillance is listed below.

LER/Docket Number	Title
88-014-0	Unit 2/3 Chimney Tritium Sampling Surveillance Interval Exceeded Due to Personnel Error.

While performing a review of the Chemistry Department surveillance performance dates, it was discovered that Dresden Chemistry Procedure (DCP) 1400-3, Calculation of Tritium Activity in Airborne Effluents, had not been performed within the allowable Technical Specification surveillance interval. Technical Specification Table 4.8.1 requires a monthly Tritium activity analysis. The surveillance was performed on July 27, 1988. However, the monthly due date was July 26, 1988. The root cause of this event was attributed to personnel error. Corrective actions included surveillance tracking administrative improvements.

G. COMPONENT FAILURE DATA:

This event did not involve component failure. Therefore, this section is not applicable.