



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

September 27, 1989

EDE LTR #89-735

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

Licensee Event Report #89-024-0, 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/jt

Enclosure

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

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LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1) Dresden Nuclear Power Station, Unit 2 Docket Number (2) 0 15 10 10 10 12 13 17 Page (3) 1 of 0 3

Title (4) Downscale Trip Not Inserted During ECCS Initiating Instrument Repairs 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	8	3	0	8	9	8	9	8	9	0 15 10 10 10 12 13 17
				0	2	4		0	0	0 15 10 10 10 12 13 17

OPERATING MODE (9) N

POWER LEVEL (10) 1 0 0

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 in Abstract below and in Text)
<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)	
<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)	
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

Name: Scott Briley, Technical Staff System Engineer Ext. 2526

TELEPHONE NUMBER: AREA CODE 8 1 5 9 4 2 1 - 2 19 12 10

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) X NO

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

At 1925 hours on August 30, 1989, with Unit 2 at 100% rated core thermal power, Level Indicating Switch (LIS) 2-263-72C was taken out-of-service (OOS) for the Instrument Maintenance Department (IMD) to repair a sensing line. This switch is part of the low low reactor water level Emergency Core Cooling System (ECCS) initiation logic and Diesel Generator (DG) auto start logic. At approximately 2050 hours, it was discovered that the instrument was in the upscale position, contrary to Technical Specification (TS) Table 3.2.2, which required insertion of a downscale trip. The cause of this event has been attributed to a management deficiency because the need for inserting the downscale trip during the repairs was not adequately communicated. The safety significance of this event was minimal because the remaining three low low reactor water level switches were available to perform the ECCS and DG start logic functions. The immediate corrective action was to initiate the downscale trip. This event has been reviewed with the individuals involved and additional corrective actions were initiated to prevent recurrence. A previous event involving failure to properly trip a TS instrument during repairs is documented by LER 87-21/050237.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Form Rev 2.0

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)						Page (3)		
		Year	///	Sequential Number	///	Revision Number				
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TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [XX]

D. SAFETY ANALYSIS OF EVENT:

Switches 2-263-72A through D have a range of +60 to -60 inches of water as referenced to instrument zero. Instrument zero is located 143 inches above the top of active fuel. The purpose of these switches is to provide a low low reactor water level signal of -59 inches as referenced to instrument zero as an input to the ECCS initiation and Unit 2 and Unit 2/3 Diesel Generator auto start logic. The redundant switch in the logic channel affected (LIS 2-263-72A) was operable and available to provide the DG auto start and ECCS initiation logic functions throughout this event. The opposite channel switches (LIS 2-263-72B and LIS 2-263-72D) were also unaffected by this event. The basis behind the TS Table 3.2.2 requirement to insert a downscale trip while LIS 2-2-263-72C was inoperable is to ensure that at least two switches are available per channel, therefore preventing postulated single failure of the remaining operable switch on the affected channel (LIS 2-2-263-72A) causing failure of the logic train. However, this condition existed for a relatively short period (one hour and 50 minutes) and Control Room personnel were aware of the work in progress. Therefore, this event was of minimal safety significance.

E. CORRECTIVE ACTIONS:

Upon discovering this discrepancy, the Shift Engineer immediately requested IMD personnel to place LIS 2-263-72C in a downscale trip condition. This event was also reviewed with the personnel involved. As a further corrective action, a review of this event will be included in an upcoming Station tailgate session (237-200-89-12201). In order to provide additional guidance on control of instruments which have TS requirements for insertion of trip signals, the Regulatory Assurance staff will perform a review of TS trip requirements for inoperable Reactor Protection System (RPS) [JC], Primary Containment Isolation System (PSIS) [JM], and ECCS initiating instrumentation (237-200-89-12202). The Operations Staff will then implement a TS interpretation policy statement based upon the Regulatory Assurance Staff evaluation in order to clarify these trip requirements (237-200-89-12202). These actions will ensure greater awareness of the trip requirements, and clarify the required actions.

F. PREVIOUS EVENTS:

<u>LER/Docket No.</u>	<u>Title</u>
87-21/050237	Failure to Place Condenser Pit Level Switch LS-2-44-24B in a Tripped Condition Due to Personnel Error
	Corrective actions included revision to an instrument surveillance procedure to include explicit reference to the TS Limiting Condition for Operation requirements associated with an inoperable condenser pit high high level alarm or trip logic circuit. The event was also reviewed with the personnel involved, and an administrative procedure for problem reporting was revised to require prompt Operations Shift Supervisor review of deviation reports.

G. COMPONENT FAILURE DATA:

No component failures occurred during this event, therefore, this section is not applicable.