CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9709040289 DOC.DATE: 97/08/27 NOTARIZED: NO DOCKET #
FACIL:50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
AUTH.NAME AUTHOR AFFILIATION
ST MARTIN,J.T. Rochester Gas & Electric Corp.
MECREDY,R.C. Rochester Gas & Electric Corp.
RECIP.NAME RECIPIENT AFFILIATION

VISSING,G.S.

SUBJECT: LER 97-003-00:on 970730,high steam flow bistable instrument setpoint plus instrument uncertainty could exceed "allowable value" in ITS was identified.Caused by entry into ITS LCO 3.0.3.Switches placed in tripped configuration.W/970827 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 5
TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:License Exp date in accordance with 10CFR2,2.109(9/19/72). 05000244

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD1-1 PD	1	1	VISSING,G.	1	1
INTERNAL:	~~AEOD/SPD/RAB~~	2	2	AEOD/SPD/RRAB	1	1
	FILE CENTER	1	1	NRR/DE/ECGB	1	1
	NRR/DE/EELB	1	1	NRR/DE/EMEB	1	1
	NRR/DRCH/HHFB	1	1	NRR/DRCH/HICB	1	1
	NRR/DRCH/HOLB	1	1	NRR/DRCH/HQMB	1	1
	NRR/DRPM/PECB	1	1	NRR/DSSA/SPLB	1	1
	NRR/DSSA/SRXB	1	1	RES/DET/EIB	1	1
	RGN1 FILE 01	1	1			
EXTERNAL:	L ST LOBBY WARD	1	1	LITCO BRYCE,J H	1	1
	NOAC POORE,W.	1	1	NOAC QUEENER,DS	1	1
	NRC PDR	1	1	NUDOCS FULL TXT	1	1

CATEGORY 1 DOCUMENT

NOTE TO ALL "RIDS" RECIPIENTS:
PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL DESK (DCD) ON EXTENSION 415-2083

FULL TEXT CONVERSION REQUIRED
TOTAL NUMBER OF COPIES REQUIRED: LTTR 24 ENCL 24

RGE AND

ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001 AREA CODE 716 546-2700

ROBERT C. MECREDY
Vice President
Nuclear Operations

August 27, 1997

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Guy S. Vissing
Project Directorate I-1
Washington, D.C. 20555

Subject: LER 97-003, Bistable Instrument Setpoint (plus Instrument Uncertainty) Could Exceed Allowable Value, Causes a Condition Prohibited by Plant Technical Specifications
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Vissing:

In accordance with 10 CFR 50.73, Licensee Event Report System, item (a) (2) (i) (B), which requires a report of, "Any operation or condition prohibited by the plant's Technical Specifications", the attached Licensee Event Report LER 97-003 is hereby submitted. A further assessment will be provided in a supplement to this LER which is expected to be submitted by September 29, 1997.

This event has in no way affected the public's health and safety.

Very truly yours,

Robert C. Mecredy

Robert C. Mecredy

xc: Mr. Guy S. Vissing (Mail Stop 14B2)
PWR Project Directorate I-1
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Ginna Senior Resident Inspector

IE22

NRC FORM 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 04/30/98

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

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
R.E. Ginna Nuclear Power Plant	05000244	1 OF 4

TITLE (4)

Bistable Instrument Setpoint (plus Instrument Uncertainty) Could Exceed Allowable Value, Causes a Condition Prohibited by Plant Technical Specifications

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
07	30	97	97	-- 003	-- 00	08	27	97	FACILITY NAME	DOCKET NUMBER

		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)			
OPERATING MODE (9)	1	20.2201(b)	20.2203(a)(2)(v)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)
POWER LEVEL (10)	100	20.2203(a)(1)	20.2203(a)(3)(i)	50.73(a)(2)(ii)	50.73(a)(2)(x)
		20.2203(a)(2)(i)	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	TELEPHONE NUMBER (Include Area Code)
John T. St. Martin - Technical Assistant	(716) 771-3641

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
X	YES (If yes, complete EXPECTED SUBMISSION DATE).	NO		09	29	97

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

On July 30, 1997, at approximately 1430 EDST, the plant was in Mode 1 at approximately 100% steady state reactor power. It was identified that the High Steam Flow Bistable Instrument Setpoint plus the Instrument Uncertainty could exceed the "Allowable Value" listed in the Ginna Station Improved Technical Specifications.

Immediate corrective action was to declare all four channels of High Steam Flow inoperable and enter Limiting Condition for Operation 3.0.3. When action was taken to place the affected bistable proving switches in the tripped position, the plant exited Limiting Condition for Operation 3.0.3.

The cause of this condition was insufficient margin between the High Steam Flow setpoint and the Allowable Value to account for process and instrument uncertainties.

Corrective action to prevent recurrence is outlined in Section V.B. Additional corrective actions will be identified in a supplement to this LER.

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
R.E. Ginna Nuclear Power Plant	05000244	97	-- 003 --	00	2 OF 4

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

I. PRE-EVENT PLANT CONDITIONS:

Personnel from Nuclear Engineering Services (NES) had been evaluating the impact of instrument uncertainties, including validation of actual plant-specific data.

On July 30, 1997, at approximately 1430 EDST, the plant was in Mode 1 at approximately 100% steady state reactor power. In activities unrelated to plant conditions, NES personnel identified that the High Steam Flow Bistable Instrument Setpoint, when added to the Instrument Uncertainty, could exceed the "Allowable Value" listed in the Ginna Station Improved Technical Specifications (ITS).

II. DESCRIPTION OF EVENT:

A. DATES AND APPROXIMATE TIMES OF MAJOR OCCURRENCES:

- July 30, 1997, 1430 EDST: Event date and time.
- July 30, 1997, 1430 EDST: Discovery date and time.
- July 30, 1997, 1527 EDST: High Steam Flow Bistable proving switches are placed in the tripped position, thus restoring the channels to operable status.

B. EVENT:

On July 30, 1997, at approximately 1430 EDST, the plant was in Mode 1 at approximately 100% steady state reactor power. In activities unrelated to plant conditions, NES personnel reported to Operations supervision that the High Steam Flow Bistable Instrument Setpoint, when added to the Instrument Uncertainty, could exceed the Allowable Value for this Engineered Safety Feature Actuation System (ESFAS) Instrumentation, as listed in ITS Table 3.3.2-1, Function 4.d.

Since the setpoint plus the uncertainty could be non-conservative with respect to the Allowable Value, all four channels of High Steam Flow were declared inoperable at approximately 1438 EDST. There is no ITS Limiting Condition for Operation (LCO) to address the condition of four channels inoperable, so ITS LCO 3.0.3 was entered.

The Plant Operations Review Committee (PORC) reviewed this condition and concurred with the recommendation to place the bistable proving switches for the affected bistables in the tripped position.

The Control Room operators placed the affected bistable proving switches in the tripped position. This action ensured that any variation in the trip setpoint would not affect the completion of affected functions for High Steam Flow. Since the four affected channels of High Steam Flow were now performing their intended function by being maintained in the tripped configuration, these four channels were declared operable at approximately 1527 EDST on July 30, 1997.

C. INOPERABLE STRUCTURES, COMPONENTS, OR SYSTEMS THAT CONTRIBUTED TO THE EVENT:

None

D. OTHER SYSTEMS OR SECONDARY FUNCTIONS AFFECTED:

None

E. METHOD OF DISCOVERY:

This condition was self-identified by an NES engineer while performing validation of calculated instrument uncertainties.

F. OPERATOR ACTION:

When notified of the results of the impact of the instrument uncertainty on operability of the High Steam Flow Bistables, Operations supervision notified the Shift Supervisor of this condition. Operations supervision also notified the NRC Resident Inspector.

Following notification, the Control Room operators declared all affected functions provided by the four channels of High Steam Flow inoperable and entered ITS LCO 3.0.3. After the affected bistable proving switches were placed in the tripped position and holds placed on these switches, they returned the four channels to operable status and exited ITS LCO 3.0.3.

G. SAFETY SYSTEM RESPONSES:

None

III. CAUSE OF EVENT:

A. IMMEDIATE CAUSE:

The immediate cause of the condition prohibited by Technical Specifications was entry into ITS LCO 3.0.3 due to four channels of High Steam Flow being declared inoperable.

B. INTERMEDIATE CAUSE:

The intermediate cause of all four channels of High Steam Flow being declared inoperable was a potential for instrument uncertainty to allow a trip setpoint to exceed the Allowable Value as listed in ITS Table 3.3.2-1 for ESFAS Instrumentation.

C. ROOT CAUSE:

The underlying cause of the potential to exceed the Allowable Value was that the existing margin between the High Steam Flow setpoint and the ITS Allowable Value is insufficient to account for process and instrument uncertainties.

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
R.E. Ginna Nuclear Power Plant	05000244	97	-- 003 --	00	4 OF 4

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

IV. ANALYSIS OF EVENT:

This event is reportable in accordance with 10 CFR 50.73, Licensee Event Report System, item (a) (2) (i) (B), which requires a report of, "Any operation or condition prohibited by the plant's Technical Specifications." Having all four channels of High Steam Flow inoperable is a condition prohibited by the Ginna Station Improved Technical Specifications.

An assessment will be performed considering both the safety consequences and implications of this condition. A supplement to this LER will be submitted with the results of this assessment.

V. CORRECTIVE ACTION:

A. ACTION TAKEN TO RETURN AFFECTED SYSTEMS TO PRE-EVENT NORMAL STATUS:

The bistable proving switches were placed in the tripped configuration, and the affected functions for High Steam Flow were restored to operable status at approximately 1527 EDST on July 30, 1997.

B. ACTION TAKEN OR PLANNED TO PREVENT RECURRENCE:

- The affected bistable proving switches are held in the tripped configuration. These switches will not be reset until completion of further evaluations.
- Additional corrective actions will be identified in a supplement to this LER.

VI. ADDITIONAL INFORMATION:

A. FAILED COMPONENTS:

None

B. PREVIOUS LERs ON SIMILAR EVENTS:

A similar LER event historical search was conducted with the following results: No documentation of similar LER events with the same root cause at Ginna Nuclear Power Station could be identified.

C. SPECIAL COMMENTS:

None