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ACCESSION NBR: 8704160139 DOC. DATE: 87/04/13 NOTARIZED: NO DOCKET #
 FACIL: 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moho 05000410
 AUTH. NAME AUTHOR AFFILIATION
 RANDALL, R. G. Niagara Mohawk Power Corp.
 LEMPGES, T. E. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 86-002-01: on 861104, procedure N2-DSP-RMC-W0002 ran for over 2 h thereby violating Tech Specs. Caused by Personnel error & procedure deficiency. Caution statement to verify all Tech Spec requirements met. W/870413 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

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	REG FILE 02		1	1	RES SPEIS, T		1	1	
	RGNI FILE 01		1	1					
EXTERNAL:	EG&G GROH, M		5	5	H ST LOBBY WARD		1	1	
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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Nine Mile Point Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 4 1 0 1	PAGE (3) 1 OF 0 3
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TITLE (4)
Technical Specification Violation - 4 SRM Downscale Channels Jumpered for Two Hours

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		
									N/A		
1 1	0 4	8 6	8 6	0 0 2	0 1	0 4	1 3	8 7	N/A		
OPERATING MODE (9) 5			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)								

POWER LEVEL (10) 0 1 0 0	20.402(b)	20.406(c)	50.73(a)(2)(iv)	73.71(b)
	20.405(a)(1)(i)	50.36(e)(1)	50.73(a)(2)(v)	73.71(e)
	20.405(a)(1)(g)	50.36(e)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(ii)	50.73(a)(2)(viii)(A)	
	20.405(a)(1)(iv)	50.73(a)(2)(iii)	50.73(a)(2)(viii)(B)	
	20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Robert G. Randall, Supervisor Technical Support	3 1 5 3 4 9 1 - 2 4 4 5

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)

<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On November 4, 1986, Nine Mile Point Unit 2 was in its initial fuel loading process with the mode switch in refuel. To satisfy Technical Specification requirements, surveillance procedure N2-OSP-RMC-W@002 was to be performed by Operations personnel at approximately 0210 hours. N2-OSP-RMC-W@002, "Reactor Mode Switch Functional Test of Refuel Interlocks" requires the pulling of selected control rods to notch-02, movement of the refueling platform towards the core, and subsequent verification of refuel interlocks. To comply with procedure prerequisite, "no rod blocks present", jumpers were installed by a licensed NMPC operator to clear SRM downscale rod blocks. The jumpers placed all four Source Range Monitors (SRM) downscale channels in a "bypassed" state and NMP2 in a "limiting condition of operation". Per Technical Specification Table 3.3.6-1 "Control Rod Block Instrumentation", the minimum number of operable SRM downscale channels is 2 in reactor mode 5. LCO 3/4 3.6.b, action item 61b states: with the number of operable channels two or more less than required by the minimum operable channels per trip function requirement, place at least one inoperable channel in the tripped condition within one hour. N2-OSP-RMC-W@002 lasted over two hours thereby violating plant Technical Specifications.

A Temporary Change Notice has been issued providing procedural additions to N2-OSP-RMC-W@002 to prevent similar Technical Specification violations. In addition, a memorandum has been sent to Operations personnel stressing the importance of Technical Specification adherence.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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TEXT (if more space is required, use additional NRC Form 366A's) (17)

I. DESCRIPTION OF EVENT

On November 4, 1986, Nine Mile Point Unit 2 was in its initial fuel loading process with the mode switch in refuel. To satisfy Technical Specifications surveillance requirements 4.9.1.2 and 4.9.1.3, procedure N2-OSP-RMC-W@002 was to be performed by Operations personnel at approximately 0210. N2-OSP-RMC-W@002, "Reactor Mode Switch Functional Test of Refuel Interlocks" requires the pulling of selected control rods to notch-02, movement of the refueling platform towards the core and subsequent verification of refuel interlocks.

To comply with procedure prerequisite 6.8 "no rod blocks present", jumpers were installed by a licensed MPC operator at panels PNL606A and PNL633D to clear SRM downscale rod blocks. (Jumper Log - Index No. 574) Clearing all rod blocks is essential in that rod blocks are generated and verified in the test.

Since the core was not fully loaded, 3 of the 4 SRMs (in the unloaded portions of the core) were reading downscale and providing a rod block signal. The jumpers placed all four SRM downscale channels in a "bypassed" state and MP2 in a "limiting condition of operation". Per Technical Specification Table 3.3.6-1 "Control Rod Block Instrumentation" the minimum number of operable SRM channels is "two" in reactor mode 5. LCO 3/4 3.6.b, action item 61b states: with the number of operable channels two or more less than required by the minimum operable channels per trip function requirement, place at least one inoperable channel in the tripped condition within one hour.

Involved personnel, unaware of Technical Specification 3/4 3.6.b, action item 61b, ran N2-OSP-RMC-W@002 for over two hours thereby violating Technical Specifications. The Technical Specification violation was not identified immediately but at a later date during the test review. The proper course of action would have been to place jumpers only on the three SRMs in the unloaded portion of the core, as SRM B was above the downscale and rod block setpoint. This would have placed the plant in a 7 day LCO rather than a 1 hour LCO, allowing sufficient time to complete the surveillance.

II. CAUSE OF EVENT

In summary, the cause of the Technical Specification violation was two fold in nature:

- 1) Human error in that the MPC senior licensed operator did not review the correct Technical Specification when approving the jumper installation.
- 2) A procedure deficiency in that N2-OSP-RMC-W@002, an approved procedure, did not include a reference to the violated Technical Specification. Nor did the procedure provide direction in jumpering individual SRM downscale channels for the less than fully loaded core condition, as it was not written considering the special conditions of initial fuel load.

There were no inop structures, components or systems that contributed to the event.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Nine Mile Point Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 4 1 0	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		8 6	— 0 0 2	— 0 1	0 3	OF 0 3

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

III. ANALYSIS OF EVENT

There were no adverse safety consequences as a result of the event described in LER 86-02. All control rods were maintained fully inserted throughout the test except for single rod movements to notch-02. There were also no fuel moves or core alterations that occurred (or could occur) during the performance of N2-OSP-RMC-W@002. SRM indication was fully available in the control room throughout the duration of the test. LER 86-02 (Revision 0) was reported due to a violation of Technical Specification 3.3.6-1.

IV. CORRECTIVE ACTION

A Temporary Change Notice (TCN) to N2-OSP-RMC-W@002 has been issued per AP-2.0. The TCN is valid until the next revision of N2-OSP-RMC-W@002 and should prevent similar Technical Specification violations with the following procedural additions:

- 1) A caution statement to the SSS to verify all Technical Specification requirements for operable SRMs are met (including control rod block instrument).
- 2) A table showing the correct application points to bypass individual SRM downscales. (only when required)
- 3) A section to record SRM condition (bypassed, jumpered, N/A).

On December 26, 1986 an internal correspondence was sent to Nine Mile Point Unit 2 Operations personnel with the following reminders:

"Proper Technical Specification adherence is the responsibility of the entire shift. Any equipment or controls observed in an off-normal condition shall be brought to the attention of the shift supervision."

"When preparing systems for surveillance testing, review, and observe all Technical Specification requirements."

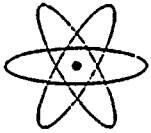
A Technical Specification cross reference index has been developed to aid operators in finding applicable Technical Specifications. This index was completed on February 26, 1987.

In conclusion, both causes of the Technical Specification violation, human error and procedure deficiency, have been addressed. No events of a similar nature had occurred prior to this event.

V. ADDITIONAL INFORMATION

Identification of Components Referred to in this LER

<u>Component</u>	<u>IEEE 803 EIIS Funct</u>	<u>IEEE 805 System ID</u>
Source Range Monitor (SRM)	JI	IG



NIAGARA MOHAWK POWER CORPORATION

NMP-23844

NIAGARA  MOHAWK

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SYRACUSE, NY 13212

THOMAS E. LEMPGES
VICE PRESIDENT—NUCLEAR GENERATION

April 13, 1987

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

RE: Docket No. 50-410
LER 86-02 Revision 1

Gentlemen:

In accordance with 10 CFR 50.73, we hereby submit the following Licensee Event Report:

LER 86-02 Which is being submitted in accordance with 10 CFR 50.73
Revision 1 (a) (2) (i) (B), "Any operation or condition prohibited by
the plant's Technical Specifications;"

Revision 1 of LER 86-02 is being submitted to add corrective action specifically addressing the human error which contributed to the event.

This report was completed in the format designated in NUREG-1022, Supplement No. 2, dated September 1985.

Very truly yours,

Thomas E. Lempges
Vice President
Nuclear Generation

TEL/JMT/mjd

Attachments

cc: Regional Administrator, Region 1
Senior Resident Inspector, W. A. Cook

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