PSEG

Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038

Salem Generating Station

April 13, 1992

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

Dear Sir:

SALEM GENERATING STATION
LICENSE NO. DPR-70
DOCKET NO. 50-272
UNIT NO. 1

LICENSEE EVENT REPORT 92-008-00

This Licensee Event Report is being submitted pursuant to the requirements of the Code of Federal Regulations 10CFR 50.73(a)(2)(i)(B). This report is required to be issued within thirty (30) days of event discovery.

Sincerely yours,

C. A Vondra
General Manager -
Salem Operations

MJP:pc

Distribution

IE22
1/1

NRC FORM 366 (6-89)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104
EXPIRES: 4/30/92

ESTIMATED BURDEN PER RESPONSE TO COMPLY WTH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Salem Generating Station - Unit 1	0 5 0 0 0 2 7 2	1 OF 0 4

TITLE (4)

Tech. Spec. Surveillance not performed when required due to inad. admin. controls

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 5 0 0 0
0 7	0 4	9 1	9 2	— 0 0 8	— 0 0	0 4	1 3	9 2		0 5 0 0 0

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
POWER LEVEL (10)	1 0 0	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
		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, NRC Form 366A)
		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
	AREA CODE
M. J. Pollack - LER Coordinator	6 0 9 3 3 9 - 2 0 2 2

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)

On 3/13/92, a scheduler discovered that a Technical Specification Surveillance for No. 12 Steam Generator (S/G) Blowdown Flow Transmitter calibration was late. The surveillance became overdue on 7/4/91. It is required to be performed every eighteen (18) months. The field copy work order for this surveillance was incorrectly identified in the Managed Maintenance Information System (MMIS) computer system as a "Preventive Maintenance" (PM) task instead of a "Surveillance Task" (ST). As a result of the missed surveillance, Technical Specification 3.3.3.8 Action 29 was entered on March 13, 1992, at 0818 hours. The root cause of this event is inadequate administrative controls. The No. 12 S/G Blowdown Flow monitor surveillance was successfully completed on 3/13/92, at 2022 hours. The other Unit 1 and Unit 2 S/G Blowdown Flow monitor surveillances were shown to have been performed within the time required as PM activities. The "Salem RT Report", which monitors the MMIS database, has been enhanced to assure consistency of task type (i.e., ST vs. PM) between the library copy and active copies. This report will be reviewed on at least a weekly basis by the Technical Specification Administrator. The first run of the revised report did not show any other similar occurrences. Authorization to change key ST work order fields in MMIS has been reduced.

PLANT AND SYSTEM IDENTIFICATION:

Westinghouse - Pressurized Water Reactor

Energy Industry Identification System (EIIS) codes are identified in the text as {xx}

IDENTIFICATION OF OCCURRENCE:

Technical Specification Surveillance not performed when required due to inadequate administrative controls

Event Date: 7/04/91
Discovery Date: 3/13/92
Report Date: 4/13/92

This report was initiated by Incident Report No. 92-181.

CONDITIONS PRIOR TO OCCURRENCE:

Mode 1 Reactor Power 100% - Unit Load 1162 MWe

DESCRIPTION OF OCCURRENCE:

On March 13, 1992, a Maintenance Department scheduler discovered that a Technical Specification Surveillance for No. 12 Steam Generator (S/G) Blowdown Flow Transmitter calibration was late. The surveillance became overdue on July 4, 1991. It is required to be performed every eighteen (18) months.

The field copy work order for this surveillance was incorrectly identified in the Managed Maintenance Information System (MMIS) computer system as a "Preventive Maintenance" (PM) task instead of a "Surveillance Task" (ST). As a result of the missed surveillance, Technical Specification 3.3.3.8 Action 29 was entered on March 13, 1992, at 0818 hours. The scheduler discovered this error while scheduling work for the next three (3) years.

ST work orders are closely tracked by both scheduling personnel and the Technical Specification Administrator via review of the "14 Day Look Ahead" report. This report identifies Technical Specification Surveillances coming due within the next fourteen (14) days. Since the surveillance was identified as a PM instead of an ST activity, it would not be identified on the report and subject to review.

Technical Specification 3.3.3.8 states:

> "The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3.-12 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.1.1 are not exceeded. The alarm trip setpoints of these channels shall be determined in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM)."

DESCRIPTION OF OCCURRENCE: (cont'd)

Technical Specification 3.3.3.8 Action 29 states:

> "With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours during actual releases. Pump performance curves may be used to estimate flow."

APPARENT CAUSE OF OCCURRENCE:

The root cause of this event is inadequate administrative controls. Access to those computer fields critical to ensuring correct scheduling and planning of work were not adequately controlled.

As stated above, the field copy work order for this surveillance was identified as a PM task. Investigation revealed that on October 10, 1987, the surveillance was completed as an ST task. Sometime later, the MMIS library copy was changed to a PM type work order. The next user work order generated from the MMIS library copy was therefore issued as a PM task. This work was performed on August 14, 1989. The next generated user work order was also issued also as a PM task. It was scheduled for February 15, 1991 (with an overdue date of July 4, 1991). Between August 1989 and the date of discovery, the library copy was reclassified as an ST task.

It could not be determined why the library copy was changed to a PM task (circa 1987) and then later (after August 16, 1989) changed back to an ST task. In that time frame, the Technical Surveillance Audit Project was on-going (reference LER 311/89-015-01). It is thought that during this project it was recognized that the work order was incorrectly identified as a PM, and that the library copy was corrected but not the active task.

A review of the other Unit 1 and Unit 2 S/G Blowdown Flow monitor surveillances was conducted. These were all performed within the times required by Technical Specification 3.3.3.8. However, it was found that some of these other blowdown flow channel work orders were performed as PM's. In all cases, the current library and active work orders are identified as ST tasks.

ANALYSIS OF OCCURRENCE:

The S/G Blowdown Flow Monitors monitor blowdown flowrate for each S/G. Control Room indication of blowdown flowrate is provided by the monitors' transmitter. No interlock functions are associated with this transmitter (e.g., blowdown isolation).

The No. 12 S/G Blowdown Flow monitor surveillance was successfully completed on March 13, 1992, at 2022 hours, at which time Technical Specification 3.3.3.8 Action Statement 29 was exited. Therefore, during the period the channel surveillance was overdue, it was functioning as designed. This event did not affect the health or

ANALYSIS OF OCCURRENCE: (cont'd)

safety of the public. However, it is reportable to the Nuclear Regulatory Commission as per Code of Federal Regulations 10CFR 50.73 (a)(2)(i)(B).

CORRECTIVE ACTION:

The No. 12 S/G Blowdown Flow monitor surveillance was successfully completed on March 13, 1992, at 2022 hours at which time Technical Specification 3.3.3.8 Action Statement 29 was exited.

A review of the other Unit 1 and Unit 2 S/G Blowdown Flow monitor surveillances was conducted. They were performed within the time required by Technical Specification 3.3.3.8.

The "Salem RT Report", which monitors the MMIS database, has been enhanced. The original report compared active work orders to library work orders to assure an active work order for each library copy. However, the comparison was limited to assuring a consistent work order number. The upgraded report will also assure consistency of task type (i.e., ST vs. PM) between the library copy and active copies. In addition, the report will identify any library copies on "hold". This will provide protection against the failure to generate an active copy. If the library copy were on hold, then a new active work order would not be generated when the current active work order is completed and a required surveillance could be missed.

The Salem RT Report will be reviewed on at least a weekly basis by the Technical Specification Administrator. The first run of the Salem RT Report did not show any other occurrences of a library work order differing in task type from its active work order.

Authorization to change key ST work order fields in MMIS has been reduced to the Technical Specification Administrator, those individuals who fill in in his absence, and MMIS programming personnel.

The Onsite Safety Review Group has been requested to initiate a review of this event to determine if there are broader MMIS concerns.

Overall control of work activity deferral has been strengthened by a recent revision to Administrative Procedure NC.NA-AP.ZZ-0010(Q), "Preventive Maintenance". It now requires System Engineering interface on deferral of PM activities.

General Manager -
Salem Operations

MJP:pc
SORC Mtg. 92-044