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RLB-89-258

November 20, 1989

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

Reference: Quad Cities Nuclear Power Station Docket Number 50-254, DPR-29, Unit One

Enclosed is Licensee Event Report (LER) 89-017, Revision 00, for Quad Cities Nuclear Power Station.

This report is submitted in accordance with the requirements of the Code of Federal Regulations, Title 10, Part 50.73(a)(2)(i)(B); which states that the licensee shall report any operation or condition prohibited by the plant's Technical Specification.

Respectfully,

COMMONWEALTH EDISON COMPANY QUAD CITIES NUCLEAR POWER STATION

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R. L. Bax Station Manager

RLB/MJB/eb

Enclosure

cc: R. Stols R. Higgins INPO Records Center NRC Region III

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

## ABSTRACT:

On October 22, 1989, Unit One was in the REFUEL mode and shut down at zero percent power. At 1657 hours, the Shift Engineer (SE) discovered that the six-month functional test procedure QOS 500-3, Functional Test for Reactor Protection System Electrical Protection Assemblies (EPAs), had not been completed within the Technical Specification allotted time frame for this surveillance. The Shift Engineer notified an Operating Engineer, and they concluded that Technical Specification 4.9.F.1.a had been violated. The Shift Engineer then instructed the Unit One Nuclear Station Operator (NSO) to move the reactor mode switch to the SHUTDOWN mode as required by Technical Specification 3.9.F.1 and to also insert a scram. The Shift Engineer notified the Operational Analysis Department (OAD) to perform the surveillance as soon as possible. The surveillance was completed at 1847 hours on October 22, 1989.

This event occurred due to a misunderstanding concerning the EPA surveillance requirements when the reactor is subcritical, depressurized, and cold. This event will be covered in license retraining.

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#### PLANT AND SYSTEM IDENTIFICATION:

General Electric - Boiling Water Reactor - 2511 MWt rated core thermal power.

EVENT IDENTIFICATION: Reactor Protection System Electrical Protections Assemblies Functional Test Not Completed on Time Due to Management Deficiency

### A. CONDITIONS PRIOR TO EVENT:

Unit: One		Event Date:	October 22, 1989	Event Time:	1700
Reactor Mode:	2	Mode Name:	REFUEL	Power Level:	0%

This report was initiated by Deviation Report D-4-1-89-090.

REFUEL Mode (2) - In this position interlocks are established so that one control rod only may be withdrawn when flux amplifiers are set at the proper sensitivity level and the refueling crane is not over the reactor. Also, the trip from the turbine control valves, turbine stop valves, main steam isolation valves, and condenser vacuum are bypassed. If the refueling crane is over the reactor, all rods must be fully inserted and none can be withdrawn.

#### B. DESCRIPTION OF EVENT:

On October 22, 1989, Unit One was in the REFUEL mode at zero percent power. At 1657 hours, the Shift Engineer discovered that the six-month functional test procedure QOS 500-3, Functional Test for Reactor Protection System (RPS) Electrical Protection Assemblies (EPAs), had not been completed within the Technical Specification required time frame for this surveillance. The surveillance had previously been performed on February 28, 1989. The allowed surveillance interval of six months, plus the 25 percent (46 days) additional time allowed by Technical Specification 1.0.DD, had expired on October 16, 1989. The Shift Engineer notified an Operating Engineer, and they concluded that Technical Specification 4.9.F.l.a. had been violated. Consequently, the RPS was declared technically inoperable. Technical Specification 3.9.F.1 requires the RPS [JC] to be operable unless the reactor mode switch [33] is in the SHUTDOWN mode. The Shift Engineer instructed the Unit One Nuclear Station Operator (NSO) to move the reactor mode switch to the SHUTDOWN mode and insert a scram, satisfying Technical Specification 3.9.F.1. The Shift Engineer then instructed the Operational Analysis Department (OAD) to perform the surveillance as soon as possible. The surveillance was completed on October 22, 1989, at 1847 hours.

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### C. APPARENT CAUSE OF EVENT:

This report is being submitted to meet the requirements of 10CFR50.73(a)(2)(1)(B). The root cause of this event is management deficiency. The Shift Engineer initiated Work Requests Q77463 and Q77464 which clearly delineated to OAD that the surveillance was due on September 1, 1989. OAD contacted the Operating Department prior to September 1, 1989, and it was agreed that in order to avoid unnecessary half scrams while the unit was operating, the surveillance could be delayed until the upcoming refueling outage. Both Operating and OAD believed that the surveillance did not need to be performed while the reactor was subcritical, depressurized, and cold.

## D. SAFETY ANALYSIS OF EVENT:

The safety of plant and personnel were not affected by this event. On October 16, 1989, the surveillance frequency exceeded 1.25 times the normal frequency. From September 17, 1989, to October 17, 1989, there was no fuel in the vessel. On October 17, 1989, a scram was inserted. Then the mode switch was put in REFUEL and the core unload was started. The scram was reset for 10 minutes on October 17, 1989, to perform startup range monitor checks, then reinserted. The only time after the fuel load started and prior to completion of the EPA surveillance that any control rod was at a position other than 00, was when control rod 38-35 drifted to position 02. It was immediately reinserted to position 00. On October 22, 1989, at 0530, the scram was reset. At 1657, the missed EPA surveillance was discovered and the scram was reinserted. Because a scram was inserted or no fuel was in the vessel for virtually all of the time between expiration of the surveillance.

## E. CORRECTIVE ACTIONS:

The immediate corrective action was to move the reactor mode switch to the SHUTDOWN mode in order to be in compliance with TS 3.9.F.1. OAD was instructed to perform the RPS surveillance which was completed on October 22, 1989. This event will be covered in license retraining (NTS 2542008909001), and will be reviewed with OAD. (NTS 2542008909002).

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# F. PREVIOUS EVENTS:

Previously, the following LERs have been submitted due to missed Technical Specification Surveillances. However, only LER 254/89-13 was due to misunderstanding of the Technical Specification requirements. Thus, the above corrective actions are considered sufficient.

LER	DESCRIPTION
265/86-02	Monthly Reactor Vent Sample Not Obtained
265/88-02	Missed RCIC Surveillance
254/88-06	Missed Weekly Rad Surveillance
254/88-02	Missed Reactor Level Surveillance
254/88-15	Missed Fire Protection Valve Surveillance
265/88-29	Missed Post Accident Monitor Surveillance
265/88-30	Missed Post Accident Monitor Surveillance
254/89-02	Missed 3.25 Internal for MSIV LLRT
254/89-03	Missed Fire Protection Surveillance
254/89-13	Missed 4 Hour Chimney Samples

# G. COMPONENT FAILURE DATA:

No component failures were involved with this event.