CCN-90-14007

PEACH BOTTOM—THE POWER OF EXCELLENCE

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January 11, 1990

Docket No. 50-278

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

SUBJECT: Licensee Event Report
Peach Bottom Atomic Power Station - Unit 3

This LER concerns the late performance of a Technical Specification surveillance requirement.

Reference:	Docket No. 50-278
Report Number:	3-89-010
Revision Number:	00
Event Date:	12/11/89
Report Date:	1/11/90
Facility:	Peach Bottom Atomic Power Station RD 1, Box 208, Delta, PA 17314

This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B).

Sincerely,

D M Smith

cc: J. J. Lyash, USNRC Senior Resident Inspector
W. T. Russell, USNRC, Region I

IE22

NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

LICENSEE EVENT REPORT (LER)

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TITLE (4)
Late Performance of Technical Specification Surveillance Due to Programmatic Deficiencies

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)
1 2	1 1	8 9	8 9	0 1 0	0 0	0 1	1 1	9 0		0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
POWER LEVEL (10)	0 2 4	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
		20.406(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)
		20.406(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		20.406(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
T. E. Cribbe, Regulatory Engineer	7 1 7 4 5 6 - 7 0 1 4

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
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

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

On December 13, 1989, the operations cognizant engineer discovered that the monthly surveillance test ST 9.7 "MSIV Partial Closure and RPS Input Functional Test" had not been performed within the surveillance interval established by Technical Specification Table 4.1.1. The test was identified on the surveillance test schedule as required to be performed by November 26, 1989. The Technical Specifications require completion of this surveillance prior to entering the RUN mode, which occurred December 8. This requirement was met because an equivalent test, ST 9.7A was performed prior to entering the RUN mode. The test interval expired on December 11 while in the RUN mode which resulted in the required Technical Specification interval being exceeded. No actual safety consequences occurred as a result of this event. The root cause of this event was a combination of programmatic weaknesses in the coordination of ST schedule and documents. A review will be performed in order to determine an improved method for coordinating ST documents in the Control Room, and delineation of the controlling responsibility for timely ST performance. ST 9.7 will be split into two procedures to separately address the weekly and monthly surveillance requirements. No previous similar LERs were identified.

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

Requirements for the Report

This report is required per 10 CFR50.73(a)(2)(i)(B) due to the untimely performance of a surveillance test required by Technical Specifications.

Unit Status at Time of Event

Unit 3 was in the RUN mode at 24 percent power.

Description of Event

On December 13, 1989, the operations cognizant engineer discovered that monthly surveillance test ST 9.7 "MSIV Partial Closure and RPS Input Functional Test" had not been performed within the surveillance interval established by Technical Specification Table 4.1.1. The Main Steam Isolation Valve (MSIV) (EIIS:ISV) input to the Reactor Protection System (RPS) function is required to be operable in the RUN mode, therefore the surveillance must be performed prior to entering RUN and monthly thereafter. The test was scheduled to be performed November 20, 1989, with a grace period ending November 26. The first three sections of ST 9.7 are used to satisfy a Technical Specification weekly surveillance requirement of the MSIV partial closure circuitry but does not test the MSIV closure input to the RPS. This weekly version of ST 9.7 was performed as scheduled on December 6, 1989. Although the full ST 9.7 was scheduled to be completed by November 26, the Technical Specifications required completion of this surveillance prior to entering the RUN mode which occurred December 8. An equivalent surveillance test, ST 9.7A, which met the Technical Specification requirement was performed in early November but expired on December 11 while in the RUN mode. The surveillance test schedule report, late grace period report, and overdue test reports were issued throughout this period in accordance with administrative procedure A-43 "Surveillance Testing System" identifying the original November 26 schedule due date of the full ST 9.7. On December 13 the cognizant engineer notified operations shift management that ST 9.7 had not been completed. ST 9.7 was then completed satisfactorily. Since adequate justification existed for deferral of ST 9.7 until December 11, the expiration date of the equivalent ST 9.7A, the total time this function was out of surveillance was two days.

Cause of the Event

The root cause of this event is a combination of programmatic weaknesses in that ST 9.7 is used to satisfy both weekly and monthly Technical Specification surveillance requirements, and in the coordination of ST documents in the Control Room and assignment of overall responsibility for timely ST performance. When operations shift management was given the test schedule indicating the ST 9.7 due date, a blank copy of ST 9.7 was also provided, which indicated on the cover sheet that it was to meet the full monthly Technical Specification requirement. However, shift management was aware that the schedule for ST 9.7 could be deferred until after entering the RUN mode and this copy of the ST was discarded. The weekly ST 9.7 was performed as scheduled on December 6. Prior to entering the RUN mode on December 8, the shift startup coordinator, when attempting to verify the status of ST 9.7 mistook the approved copy of the completed weekly ST 9.7 for a completed full monthly ST 9.7.

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

Analysis of the Event

No actual safety consequences occurred as a result of this event.

The complete monthly ST 9.7 performs a functional test of the ability of a MSIV closure signal to actuate the RPS and associated alarms. Technical Specification Table 3.1.1 requires this function to be operable in the RUN mode. MSIV closure occurs on low reactor vessel (EIIS:RPV) water level, low steam line pressure, high steam line flow, high steam line radiation, or high steam tunnel temperature.

This event is considered to be of minimal safety significance. Generic Letter 87-09 states that it is overly conservative to assume that systems or components are inoperable when a surveillance has not been performed. Satisfactory performance of ST 9.7 on December 13 demonstrated that the MSIV closure input to the RPS was operable.

Corrective Actions

A review will be performed in order to determine an improved method for coordinating ST documents in the Control Room, and delineation of the controlling responsibility for timely ST performance.

ST 9.7 will be split into two separate procedures. One will address the weekly MSIV partial closure Technical Specification requirements. The other will address the monthly MSIV closure inputs to the RPS. Additionally, operations STs will be reviewed to identify any other such multiple uses for a given ST.

Previous Similar Events

While previous instances of the late performance of surveillance tests have occurred, the circumstances of this event are unique to this event.