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ILLINOIS POWER COMPANY

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CLINTON POWER STATION. P.O. BOX 678, CLINTON, ILLINOIS 61727

January 8, 1990

10CFR50.73

Docket No. 50-461

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

Subject: Clinton Power Station - Unit 1 Licensee Event Report No. 89-040-00

Dear Sir:

Please find enclosed Licensee Event Report No. 89-040-00: <u>Omission of Mode Limitations From Surveillance Procedure Results in</u> <u>Inoperable Anticipated Transient Without Scram Recirculation Pump Trip</u> <u>System Instrumentation</u>. This report is being submitted in accordance with the requirements of 10CFR50.73.

Sincerely yours,

レスル北

D. L. Holtzscher Acting Manager -Licensing and Safety

TSA/krm

Enclosure

cc: NRC Resident Office NRC Region III, Regional Administrator INPO Records Center Illinois Department of Nuclear Safety NRC Clinton Licensing Project Manager

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U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES. 8/31/08

LICENSEE EVENT REPORT (LER)

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DESCRIPTION OF EVENT

On December 9, 1989, the Shift Supervisor identified that on December 6 and 7, 1989, during the performance of surveillance testing, Technical Specification 3.3.4.1 requirements for the Anticipated Transient Without Scram (ATWS) Recirculatic Pump Trip (RPT) system instrumentation were not met.

On December 6, 1999, the plant was in Mode 1 (POWER OPERATION) and the reactor [RCT] was at sixty-five percent power. At 1710 hours, in accordance with surveillance 9434.02, "ATWS Reactor Pressure High Level B21-N401A (B,E,F) Channel Calibration", Control and Instrumentation (C&I) technicians began surveillance testing on reactor pressure high level channel 1B21-N401B. In accordance with the surveillance procedure, the C&I technicians placed the test switch on the front of ATWS panel [PL] 1RR04JB in the "TEST" position. The C&I technicians then proceeded with the channel calibration. By 1925 hours, the C&I technicians had completed the surveillance with satisfactory results and had restored the system.

On December 7, 1989, at 2018 hours, in accordance with surveillance 9434.02, C&I technicians began surveillance testing on reactor pressure high level channel 1B21-N401F. The test switch on the front of ATWS panel 1RR04JB was again placed in the "TEST" position. By 2204 hours, the C&I technicians had completed the surveillance with satisfactory results and had restored the system.

On December 9, 1989, a C&I foreman requested permission from the Shift Supervisor to perform surveillance 9434.02 on reactor pressure high level channel 1B21-N401E. During discussion of the surveillance it was brought to the Shift Supervisor's attention that placing the test switch on the front of the ATWS panel in the "TEST" position bypasses the trip function of all four channels (two reactor pressure high level and two reactor water level low channels) in that trip system. After reviewing the applicable Technical Specifications, the Shift Supervisor identified that Technical Specification 3.3.4.1 requirements were not met during the performance of surveillance 9434.02 on either December 6 or 7, 1989.

Technical Specification 3.3.4.1 requires that two reactor pressure high level and two reactor vessel water level low channels per trip system be operable in Mode 1. If any one of the four channels in a trip system becomes inoperable it must be restored to an operable status within forty-eight hours or the plant must be placed in at least Mode 2 (STARTUP) within the next six hours. However, in accordance with the Technical Specification, one channel may be placed in an inoperable status for up to two hours for required surveillances provided the redundant trip system is operable and monitoring that parameter. Placing the test switch on the front of the ATWS panel in the "TEST" position LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES 8/31/00

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bypassed four channels, placing them in an inoperable status. Therefore, the requirements of Technical Specification 3.3.4.1 were not met.

No automatic or manually initiated safety system responses were necessary to place the plant in a safe and stable condition. No equipment or components were inoperable at the start of this event such that their inoperable condition contributed to this event.

CAUSE OF EVENT

The cause of this event is attributed to an inadequate procedure. Surveillance 9434.02 did not identify that to comply with Technical Specification 3.3.4.1, surveillance 9434.02 must be performed in operational conditions other than Mode 1.

CORRECTIVE ACTIONS

Surveillance 9434.02 has been revised to specify that the surveillance shall not be performed in Mode 1.

A review determined that surveillance 9434.02 had not been performed in Mode 1 prior to December 6, 1989.

Additionally, although surveillance 9434.01, "ATWS Reactor Vessel Water Level B21-N400A (B,E,F) Channel Calibration" has never contained a requirement to place the test switch on the front of the ATWS panel in the "TEST" position, it been revised to specify that the surveillance shall not be performed in Mode 1.

The Licensing and Safety Department is evaluating changing Technical Specification 3.3.4.1 to allow one trip system, versus one trip channel, to be placed in an inoperable status for a limited time to perform surveillance testing. This evaluation is expected to be completed by April 4, 1990.

ANALYSIS OF EVENT

The requirements of Technical Specification 3.3.4.1 were not met from 1710 to 1925 hours on December 6, 1989, and from 2018 to 2204 hours on December 7, 1989. Therefore, this event is reportable under the provisions of 10CFR50.73(a)(2)(i)(B).

Assessment of the nuclear safety consequences and implications of this event indicates that this event is not nuclear safety significant. During the limited time that one ATWS RPT system was inoperable the redundant trip system was available to limit the consequences of the unlikely occurrence of the failure to scram during an anticipated transient.

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U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104

EXPIRES 8/31/88

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ADDITIONAL INFORMATION

No components failed during this event.

LER 89-026-00 discusses the missed verification of trip setpoints for the Average Power Range Monitors. A deficient procedure, possibly resulting from confusion of Technical Specification requirements, resulted in the missed verification.

For further information regarding this event, contact S. E. Rasor, Director - Plant Maintenance, at (217) 935-8881, extension 3204.