CCN-90-14036

PHILADELPHIA ELECTRIC COMPANY
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PEACH BOTTOM—THE POWER OF EXCELLENCE

D. M. Smith
Vice President

February 23, 1990
Docket No. 50-277

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

SUBJECT: Licensee Event Report
Peach Bottom Atomic Power Station - Unit 2

This LER concerns a daily instrument check that was not being performed as required by Technical Specifications.

Reference:	Docket No. 50-277
Report Number:	2-90-001
Revision Number:	00
Event Date:	01/24/90
Report Date:	02/23/90
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,

for Doug Smith

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

IE22
1/1

NRC Form 366
(9-83)

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

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Peach Bottom Atomic Power Station - Unit 2	0 5 0 0 0 2 7 7	1 OF 0 3

TITLE (4) Shift Surveillance Log did not meet the requirements of Technical Specifications due to a Deficient Procedure

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 1	2 4	9 0	9 0	— 0 0 1	— 0 0	0 2	2 3	9 0	PBAPS - Unit 3	0 5 0 0 0 2 7 8
										0 5 0 0 0

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
N		20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
1 0 0		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
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
X YES (If yes, complete EXPECTED SUBMISSION DATE)	NO		0 4	2 5	9 0

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

On January 24, 1990, it was discovered that the daily instrument check of the main stack flow rate monitor was not being performed as required by Technical Specification (TS) 4.8.C.4.b. The cause of this event was an incomplete procedure which occurred as a result of an inadvertent omission of this instrument check during a comprehensive revision to the shift surveillance logs. No actual safety consequences occurred as a result of this event. The shift surveillance log ST 9.1-3Z was revised to include the daily instrument check. A systematic review of TS required instrument checks has been performed to ensure TS requirements are being adequately addressed. There were three previous similar LERs.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Peach Bottom Atomic Power Station Unit 2	0 5 0 0 0 2 7 7	9 0	— 0 0 1	— 0 0	0 2 OF 0 3

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

Requirements for the Report

This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B) because a surveillance required by Technical Specifications (TS) was not being performed.

Unit Status at Time of the Discovery of the Event

Unit 2 was in the Run Mode at 100% rated thermal power.

Unit 3 was in the Run Mode at 100% rated thermal power.

There were no structures, components, or systems that were inoperable at the start of the event that contributed to the event.

Description of the Event

On January 24, 1990, at 1200 hours while performing a review of TS required instrument checks, it was discovered that the daily instrument check of the main stack flow rate monitor (EIIS:MON) was not being performed as required by TS 4.8.C.4.b.

The main stack flow rate monitor instrument is common to both units 2 and 3. Prior to an October 14, 1989 revision of an operating shift surveillance log, this parameter was being logged daily.

Cause of the Event

The cause of this event was an incomplete procedure which occurred as a result of an inadvertent omission of this instrument check during a comprehensive revision to the shift surveillance logs.

Revision 15 of Surveillance Test (ST) 9.1-3Z (one of the shift surveillance logs) contained a step requiring an instrument check of the main stack flow rate monitor, but it had been deleted by revision 16 dated October 14, 1989.

The operating shift surveillance logs under went an extensive revision prior to Unit 3 restart (November 1989). The procedures were extensively reformatted to improve human factors (i.e., rearranged to better coordinate the instrument order list in the ST with the outlay of Control Room instruments), and the procedures were revised to incorporate the labeling enhancements made during Control Room modifications. The daily check of the main stack flow rate monitor was inadvertently omitted from ST 9.1-3Z during this revision.

Analysis of the Event

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

Although the main stack flow rate monitor was not included on the shift log surveillance test, this instrument has a history of being reliable and functioning properly. Additionally, ST 7.6.1.J "Determination of Total Noble Gas Release Rate" uses the main stack flow as read from the main stack flow rate monitor in determining

the total noble gas release rates in site gaseous effluent. The total noble gas release rate calculation is performed on average five times each week. Although the daily instrument check had not been performed since November 1989, routine performance of ST 7.6.1.J demonstrated that the main stack flow rate monitor was operational.

Corrective Actions

On February 1, 1990, the operating shift surveillance log ST 9.1-3Z was revised to include the daily instrument check. From January 24, 1990 to February 1, 1990 the daily instrument check of the main stack flow rate monitor was performed during ST 7.6.1.J.

A systematic review of the shift surveillance logs has been conducted to ensure operating and shutdown TS required instrument checks are included. No additional discrepancies were identified.

Previous Similar Events

Three previous LERs were identified, LERs 2-88-18, 2-88-27, and 2-89-01 in which TS requirements were not met due to procedural inadequacies which resulted from a previous test revision. Part of the corrective actions associated with a root cause evaluation, which was performed as a result of these three LERs, was to assign a sponsor for each ST procedure. Additionally, Administrative (A) Procedure A-47 "Surveillance Test Procedures" was revised to administratively control the sponsor's responsibility during review of ST revisions.

An investigation is being performed to determine why these corrective actions did not prevent this event. The results of the investigation will be reported in a revision to this LER.