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March 23, 1990

the southern electric system

W. G. Hairston, III Senior Vice President Nuclear Operations

ELV-01458 0304

Docket No. 50-424

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D. C. 24555

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
LICENSEE EVENT REPORT
FAILURE TO COMPLY WITH TECHNICAL SPECIFICATION 3.0.4
OCCURS ON ENTRY INTO MODE 6

In accordance with 10 CFR 50.73, Georgia Power Company hereby submits the enclosed report related to an event which occurred on March 1, 1990.

Sincerely,

W. G. Hairston, III

WGH, III/NJS/gm

Enclosure: LER 50-424/1990-04

xc: Georgia Power Company

Mr. C. K. McCoy Mr. G. Bockhold, Jr. Mr. R. M. Odom Mr. P. D. Rushton

NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebneter, Regional Administrator

Mr. T. A. Reed, Licensing Project Manager, NRR

Mr. R. F. Aiello, Senior Resident Inspector, Vogtle

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On 3-1-90, at 0133 CST, a failure to comply with Technical Specification (TS) 3.0.4 occurred when Unit 1 entered Mode 6 (Refueling) from Mode 5 (Cold Shutdown). Prior to entering Mode 6, a Limiting Condition for Operation (LCO) had been initiated for Source Range Channel 1N31 to allow performance of an 18 month channel calibration. Although this LCO remained in effect, the Shift Superintendent signed off on the applicable procedure to indicate he had reviewed the LCO Book for impact on entering Mode 6 and that approval was granted to change status from Mode 5 to Mode 6. After entry into Mode 6, the Shift Superintendent recognized that TS 3.9.2 requires two Source Range Monitors to be operable in Mode 6 and that a failure to comply with TS 3.0.4 had occurred. No immediate action was required since the action requirements of TS 3.9.2 were satisfied.

The root cause for this event is considered to be cognitive personnel error by the Shift Superintendent. The Shift Superintendent has been counseled and a copy of this LER will be placed in the Operations Required Reading Book.

YES III VEL COMPLETE EXPECTED SUBMISSION DATE!

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

NAC	Form	3644
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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6) PAI	GE (3)									
		YEAR SEQUENTIAL REVISION NUMBER										
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A. REQUIREMENT FOR REPORT

This report is required per 10 CFR 50.73(a)(2)(i) because of a failure to comply with Technical Specification (TS) 3.0.4.

B. UNIT STATUS AT TIME OF EVENT

Unit 1 had begun its second refueling outage. This event occurred when Unit 1 entered Mode 6 (Refueling) from Mode 5 (Cold Shutdown). Reactor coolant temperature and pressure were approximately 110 degrees Fahrenheit and 0 psig respectively. Additionally, the Reactor Coolant System was drained to midloop and nozzle dams had been installed.

C. DESCRIPTION OF EVENT

On 2-28-90, a Limiting Condition for Operation (LCO) was entered to allow performance of an 18 month surveillance in accordance with procedure 24695-1, "Nuclear Instrumentation System (NIS) Source Range Channel 1N31 Channel Calibration". Entry of the LCO for Source Range Channel 1N31 was appropriately recorded in the LCO Book and in the Unit 1 Shift Supervisor Log.

On 3-1-90, procedure 12007-C, "Refueling Entry (Mode 5 to Mode 6)," was being performed in preparation for entry into Mode 6. Items (4) and (5) of step 4.3.1.c were completed by the Shift Superintendent and initialed off. Step 4.3.1.c reads: "REVIEW the following for impact on entering Mode 6: (1) Jumper and Lifted Wire Log, (2) Temporary Modification Log, (3) Equipment Clearance Log, (4) LCO Book, (5) Outstanding Work Orders." At 0014 CST, the Shift Superintendent signed off on procedure 12007-C to indicate approval to change status from Mode 5 to Mode 6. At 0133 CST, Mode 6 was entered when Reactor Vessel Head stud detensioning commenced.

Several hours later, the Shift Superintendent was briefing the Operations Manager on plant status and it was recognized that a failure to comply with TS 3.0.4 had occurred on the entry into Mode 6. At the time of the mode change, the LCO for Source Range Channel 1N31 was still in effect and the channel was still in "test" for performance of surveillance procedure 24695-1. Technical Specification 3.9.2 requires two Source Range Neutron Flux Monitors to be operable in Mode 6. Therefore, the requirements of TS 3.0.4, which state in part "Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the conditions for the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements," had not been fully met. The action requirements of TS 3.9.2 state that with one Source Range Neutron Flux Monitor inoperable or not operating, to immediately suspend all operations involving core alterations or positive reactivity changes. These action requirements were met and no immediate corrective action was required.

NRC Form 3664 (9-63)

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-0104

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

D. CAUSE OF EVENT

The root cause for this event is considered to be cognitive personnel error on the part of the Shift Superintendent. In reviewing the LCO Book and signing off on procedure 12007-C, the Shift Superintendent should have recognized the LCO for Source Range Channel 1N31 as being a mode change restraint. There were no unusual characteristics of the work location that contributed to the occurrence of this event.

E. ANALYSIS OF EVENT

The action requirements of TS 3.9.2 state that with one Source Range Neutron Flux Monitor inoperable or not operating, to immediately suspend all operations involving core alterations or positive reactivity changes. These action requirements were complied with. By 1120 CST on 3-1-90, surveillance procedure 24695-1 had been completed and the LCO for Source Range Channel 1N31 was exited at that time. Since the action requirements of TS 3.9.2 were complied with, there was no adverse effect on plant safety or on the health and safety of the public.

F. CORRECTIVE ACTIONS

- The involved Shift Superintendent has been counseled regarding his failure to recognize the LCO for Source Range Channel 1N3! as a mode change restraint.
- 2. A copy of this LER will be placed in the Operations Required Reading Book to reemphasize the need to be aware of mode change restraints.

G. ADDITIONAL INFORMATION

1. Failed Component Identification

None.

2. Previous Similar Events

A failure to fully comply with TS 3.0.4 previously occurred for Unit 1 on 10-28-87 (reference LER 424/87-061), when the Unit changed status from Mode 4 (Hot Shutdown) to Mode 3 (Hot Standby) with certain required equipment having not been verified as operable prior to completing the mode change. However, the root causes for these two events differ slightly in that the earlier event resulted from a failure to implement "Information Only LCO's".

Energy Industry Identification System Codes

Incore/Excore Monitoring System - IG