

Commonwealth Edison LaSalle County Nuclear Station 2601 N. 21st. Rd. Marseilles, Illinois 61341 Telephone 815/357-6761

February 15, 1994

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

Licensee Event Report #94-003-00, Docket #050-373 is being submitted to your office in accordance with 10CFR50.73(a)(2)(i).

D. Ray

D. J. Ray -Station Manager LaSalle County Station

DJR/RW/mkl

Enclosure

xc: Nuclear Licensing Administrator NRC Resident Inspector NRC Region III Administrator INPO - Records Center IDNS Resident Inspector

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On January 20, 1994 Unit 1 was in Operational Condition 1 (Run) at 94% power. At 1800 hours, monthly functional tests for

three Reactor Protection System (RPS) Instrumentation "Functional Units" listed in Table 4.3.3.1-1, of Technical Specification Surveillance Requirement 4.3.3.1, exceeded the specified monthly surveillance interval and the allowed factor of 1.25 times the surveillance interval. LaSalle received a Notice of Enforcement Discretion (NOED) from the NRC at 1300 hours on January 20, 1994, which allowed for an additional 48 hours in which to complete the surveillance testing on Unit 1.

Reactor Protection System (RPS) Instrumentation Surveillances cause multiple half-scrams (one of the two RPS trip systems tripped at a time). During half-scram testing, a single equipment failure or error may cause a full reactor scram. Therefore, LaSalle pursued requesting an NOED to postpone three half-scram surveillances until an adequate reserve margin based on power availability and system stability was reestablished. The subject RPS instrumentation surveillances were Main Steam Line Isolation Valve - Closure, Turbine Stop Valve - Closure, and Turbine Control Valve Fast Closure, Valve Trip System Oil Pressure - Low.

The apparent cause of the event was an unstable grid system combined with an extremely low reserve on the Commonwealth Edison Company (CECo) distribution system and extremely cold weather.

The Technical Specification Surveillances were completed at 0608 hours on January 22, 1994.

This event is reportable pursuant to 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the Plants Technical Specifications.

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### PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor

Energy Industry Identification System (EIIS) codes are identified in the text as [XX].

#### A. CONDITION PRIOR TO EVENT

Unit(s):	Event Date: 1/20/94	Event Time: 1800 Hours
Reactor Mode(s):1	Modes(s) Name: Run	Power Level(s): 94,2%

### B. DESCRIPTION OF EVENT

On January 20, 1994 Unit 1 was in Operational Condition 1 (Run) at 94% power. At 1800 hours Technical Specification Surveillance Requirement 4.3.3.1, monthly functional tests for three Reactor Protection System (RPS, RP)[JC] Instrumentation "Functional Units" listed in Table 4.3.3.1-1, exceeded the specified monthly surveillance interval and the allowed factor of 1.25 times the surveillance interval. LaSalle received a Notice of Enforcement Discretion (NOED) from the NRC at 1300 hours on January 20, 1994, which allowed for an additional 48 hours in which to complete the surveillance testing on Unit 1.

RPS Instrumentation Surveillances cause multiple half-scrams (one of the two RPS Trip Systems tripped at a time). During half-scram testing, a single equipment failure or error may cause a full reactor scram. Therefore, LaSalle pursued requesting an NOED to postpone three half-scram surveillances until an adequate reserve margin based on power availability and system stability was reestablished. The surveillances exceeded the allowed surveillance interval of 38.75 days (1.25 times the monthly frequency of 31 days) on January 20, 1994 at 1800 hours CST. The subject RPS instrumentation surveillances were Main Steam Line Isolation Valve - Closure, Turbine Stop Valve - Closure, and Turbine Control Valve Fast Closure, Valve Trip System Oil Pressure - Low.

Extremely low system reserve on the CECo distribution system on January 19, 1994 prompted the CECo Bulk Power Supply office to request that LaSalle Station Unit 1 postpone the performance of testing that could jeopardize the ability of the unit to continue supplying power to the distribution system. Any loss of a large source of power, such as LaSalle Unit 1, would have reduced the margin of electrical stability on the Midwest Grid.

CECo was purchasing power from utilities in the eastern United States due to system demand at the time. LaSalle Unit 2 was in a forced outage, unable to assist in meeting system demands. Eratern utilities were experiencing weather related system power problems, and anticipated not being able to continue to meet their system demand in addition to continuing sales to CECo. Relief from the weather conditions was expected sometime during the weekend of January 22 and 23, 1994. LaSalle committed to performing the surveillances on Unit 1 while in Operating Condition 1 (Run Mode) as soon as the CECo system power supply conditions allowed. These Technical Specification Surveillances were completed at 0608 hours on January 22, 1994.

This LER is submitted pursuant to the requirements of 10CFR50.73(a)(2)(i)(B) any condition prohibited by the Plants Technical Specifications.

#### C. APPARENT CAUSE OF EVENT

The apparent cause of the event was an unstable grid system combined with an extremely low reserve on the Commonwealth Edison Company (CECo) distribution system and extremely cold weather.

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D. SAFETY ANALYSIS OF EVENT

The granting of the NOED allowed CECo to postpone the functional testing of selected RPS instrumentation. The instrumentation remained fully operable; the testing confirms that the components remain operable between calibration tests. Extending the testing interval by 48 hours did not increase the potential for instrument failure even though the ability to detect a failure was slightly delayed. Redundant channels exist to accommodate the low probability of a component failure. The components in the RPS are "fail safe" such that failure mechanisms are immediately d/tectable. RPS instrumentation functional tests were completed for the Average Power Range Monitors (APRMs) on January 19, 1994 assuring that the scraw channels were Operable. The slight extension of the surveillance interval presented minimal impact on safety.

The General Electric (GE) Topical Reports (References 1 and 2), provide justification for extending the surveillance frequency from monthly to quarterly for numerous surveillances including these at issue. Reference 1 has been used by other utilities to change Technical Specifications to reflect this surveillance extension. Reference 2 demonstrates that LaSalle County Station Units 1 and 2 are bounded by the analyses approved in Reference 7 by the NRC. CECo is currently in the process of final approval of this Technical Specification request for sub/wittal to the NRC. Part of the basis includes increasing the frequency of the Manual Scram Reactor Protection Syster/a Instrumentation Channel Functional Test from monthly to weekly. The NRC has concurred with this conclusion in its review of the topical reports. Although the Manual Scram functional tests were not recently done, the APP/a functional tests were performed on January 19, 1994, verifying the Reactor Protection System channels are Operable.

The extension did not involve a significant increase in the probability or conrequences of an accident previously evaluated. The extension increased the surveillance test interval (STI) for 4PS instrumentation. There were no changes to the systems themselves. This did not change the probability of an occurrence of an accident or the consequences of an accident or the consequence of a malfunction of equipment. With respert to the malfunction of equipment, topical reports (References 1 and 2) prepared by GE demonstrate that there is a reduction in scram frequency for the RPS. Part of this basis included increasing the frequency of the Manual Scram Reactor Protection System Instrumentation Channel Functional Test from monthly to weekly. The NRC has concurred with this conclusion in its review of the topical reports. Although the Manual Scram functional tests were not completed prior to the extension, the APRM functional tests were performed on January 19, 1994, verifying that the Reactor Protection System channels were Operable. The extension was consistent with the safety evaluation reports issued in the topical reports. The extension did not involve a significant increase in the probability or consequences of an accident previously evaluated.

The extension did not create the possibility for an accident or malfunction of a different type than any evaluated previously in the UFSAR. The extension increased the STI for RPS instrumentation functional tests. There were no changes to the systems. Since there are no system changes there is no possibility of a different accident or malfunction type than any previously evaluated.

The extension did not reduce the margin of safety as defined in the basis for any Technical Specification. There was no change to any setpoints in the RPS system or the levels of redundancy. Setpoints are based on drift occurring between specified calibration intervals and not on functional test frequencies. The bases either do not discuss the STI or state "... one channel may be inoperable for brief intervals to conduct required surveillance." The change in functional test frequency does not affect this basis. Based on the analysis prepared by GE and approved by the WRC, which examined the effects of extending the STI, there was no significant reduction in the margin of safety.

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## E. CORRECTIVE ACTIONS

The Technical Specification Surveillances were completed at 0608 hours on January 22, 1994. No further corrective actions are required.

# F. PREVIOUS EVENTS

None.

# G. COMPONENT FAILURE DATA

There was no associated component failure(s).

## REFERENCES

- General Electric Topical Report, "Technical Specification Improvement Analysis for the Reactor Protection System," NEDC-30851P-A, DRF ADO-02119-A, March 1988.
- General Electric Topical Report, "Technical Specification Improvement Analysis for the Reactor Protection System for LaSalle County Station, Units 1 and 2," MDE-83-0485 Rev. 3, DRF C71-00072-1, April 1991.
- Letter of January 20, 1994, G.G. Benes (CECo) to J.B. Martin (NRC), "LaSalle County Nuclear Power Station Unit 1 Request for Regional Enforcement Discretion Regarding Facility Operating License NPF-11, Appendix A, Technical Specification Surveillance Requirement 4.3.1.1".

