

**North
Atlantic**

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The Northeast Utilities System

Ted C. Feigenbaum
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NYN-94032

March 25, 1994

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Reference: Facility Operating License No. NPF-86, Docket No. 50-443

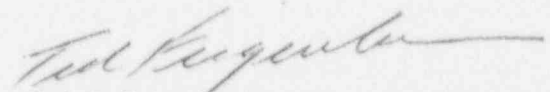
Subject: Licensee Event Report (LER) No. 94-04-00; Missed Surveillance - Technical Specification 3.3.3.10, Radioactive Gaseous Effluent Monitoring Instrumentation

Gentlemen:

Enclosed please find Licensee Event Report (LER) No. 94-004-00 for Seabrook Station. This submittal documents a condition which was identified as reportable on February 24, 1994. This event is being reported pursuant to 10CFR50.73(a)(2)(i)(B).

Should you require further information regarding this matter, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 474-9521, extension 3772.

Very truly yours,


Ted C. Feigenbaum

TCF:MJM/act

Enclosures: NRC Forms 366, 366A

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cc: Mr. Thomas T. Martin
Regional Administrator
United States Nuclear Regulatory Commission
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Mr. Albert W. De Agazio, Sr. Project Manager
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LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	SEABROOK STATION	DOCKET NUMBER (2)	05000443	PAGE (3)	1 OF 3
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TITLE (4)
Missed Surveillance - Technical Specification 3.3.3.10, Radioactive Gaseous Effluent Monitoring Instrumentation

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 NAME	DOCKET NUMBER
02	24	94	94	04	00	03	25	94	FACILITY NAME	DOCKET NUMBER
										05000
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)								
POWER LEVEL (10)	100	20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)		
		20.405(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		
		20.405(a)(1)(iii)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 366A)		
		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	Mr. James M. Peschel, Regulatory Compliance Manager	TELEPHONE NUMBER (Include Area Code)	(603) 474-9521 ext. 3772
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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 15 single-spaced typewritten lines) (16)

On February 24, 1994, North Atlantic Energy Service Corporation (North Atlantic) determined that Technical Specification Surveillance Requirement 4.3.3.10, which requires a source check of the plant vent Wide Range Gas Monitor Noble Gas Activity Monitor [VL] to be performed monthly, had been missed.

On November 9, 1993, the plant vent Wide Range Gas Monitor (WRGM) was declared inoperable and Technical Specification 3.3.3.10, Action b entered to implement a design modification. During the period of November 9, 1993 to December 6, 1993 the required actions associated with the inoperable WRGM were performed. On December 6, 1993 the WRGM was declared OPERABLE and required actions discontinued. On December 8, 1993 it was determined that the WRGM had been declared OPERABLE on December 6, 1993 without having performed all required source checks. A satisfactory source check was performed pursuant to Technical Specification 4.0.3, and the WRGM returned to OPERABLE status on December 8, 1993.

There were no adverse safety consequences as a result of this event.

The root cause of this condition has been determined to be an inadequate method used to track Technical Specification surveillances which are due to be performed when the equipment is removed from service for a design modification.

North Atlantic will revise the maintenance procedure to require verification that outstanding Technical Specification surveillances have been performed prior to returning equipment to OPERABLE status, following a design change or minor modification.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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SEABROOK STATION	05000443	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
		94	04	00	

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

Description of Event

On February 24, 1994, North Atlantic Energy Service Corporation (North Atlantic) determined that Technical Specification Surveillance Requirement 4.3.3.10, which requires a source check of the plant vent Wide Range Gas Monitor Noble Gas Activity Monitor [VL] to be performed monthly, had been missed.

Seabrook Station Technical Specification 3.3.3.10 requires the plant vent wide range gas monitor (WRGM) to be OPERABLE at all times. Technical Specification Surveillance Requirement 4.3.3.10 requires that each radioactive gaseous effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performing, among other tests, SOURCE CHECKS at the frequencies shown in Table 4.3-6. Table 4.3-6 requires a source check of the WRGM monthly.

On November 9, 1993, North Atlantic entered Technical Specification 3.3.3.10, Action b, when the Wide Range Gas Monitor (WRGM) was taken out of service in order to implement a design modification. During the period of November 9, 1993 to December 6, 1993 the required actions associated with the inoperable WRGM were performed. On December 6, 1993, the WRGM was declared OPERABLE and Technical Specification 3.3.3.10 Action b was exited. The source checks required by Surveillance Requirement 4.3.3.10 had been performed on the WRGM on October 24, 1993 and were next due on November 21, 1993. On November 21, 1993 the WRGM was inoperable, and therefore the source checks were not performed as permitted by Technical Specification 4.0.3. On December 6, 1993, the low range WRGM channel was source checked. However, a source check of the mid and high range channels was not performed.

On December 8, 1993, North Atlantic determined that the source check of the mid and high range WRGM channels had not been performed on December 6, 1993. The source checks were subsequently performed pursuant to Technical Specification 4.0.3 with satisfactory results on December 8, 1993. On February 24, 1993, North Atlantic determined that this condition was reportable because the surveillance interval, including extensions permitted by Technical Specification 4.0.2 was exceeded.

Safety Consequences

There were no adverse safety consequences as a result of this event. The source checks performed on the WRGM on December 8, 1993 verified that the WRGM was operating within its required limits. Therefore, the WRGM could have been expected to detect any unacceptable levels of radioactive gaseous effluents had they been present in the plant vent.

Root Cause

The root cause of this event was determined to be an inadequate method used to track Technical Specification surveillances which are due to be performed when the equipment is removed from service for a design modification. The work document did not provide a method to identify that the postponed surveillance was required to be performed during the period the equipment was removed from service.

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TEXT CONTINUATION

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

Corrective Actions

1. North Atlantic will revise procedure MA 4.13, Design Change Implementation and Post Modification Testing, to require verification that outstanding Technical Specification surveillances have been performed prior to returning equipment to OPERABLE status, following a design change or minor modification.

Plant Conditions

At the time of this event, the plant was in Mode 1, at 100 percent power.

Related Events

North Atlantic has reported other instances where Technical Specification Surveillance requirements were missed upon returning equipment to service in Licensee Event Reports 92-023-00 and 92-014-00.