T. S. 6.9.2 PHILADELPHIA ELECTRIC COMPANY LIMERICK GENERATING STATION P. O. BCX A SANATOGA, PENNSYLVANIA 19464 (215) 327-1200 Ext. 2000 January 23, 1991 J. DOERING, JR. PLANT MANAGER LIMEBICK GENERATING STATION Docket No. 50-352 License No. NPF-39 U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555 SUBJECT: Special Report Limerick Generating Station - Unit 1 This Special Report reports the inoperability of the Unit 1 Loose-Part Monitoring System for more than 30 days due to the failure of one of the Printed Circuit Boards. Docket No. 50-352 Reference: 1-91-003 Report Number: Revision Number: 00 January 13, 1991 January 23, 1991 Event Date: Report Date: Limerick Generating Station Facility: P.O. Box A. Sanatoga, PA 19464 This Special Report is being submitted pursuant to the requirements of Technical Specifications Section 6.9.2 as required by Technical Specifications Section 3.3.7.10, "Loose-Part Detection System." Very truly yours, JKP:rgs co: T. T. Martin, Administrator, Region I, USNRC T. J. Kenny, USNRC Senior Resident Inspector, LGS 9101280209 910123 PDR ADOCK 05000352

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On January 13, 1991, the Limerick Generating Station (LGS) Unit 1 Loose-Part Monitoring System (LPMS) was inoperable for more than 30 days requiring submittal of a Special Report in accordance with the requirements of Technical Specifications (TS) Section 6.9.2. On December 5, 1990, during an independent verification of a Surveillance Test (ST) procedure, ST-2-036-640-1, "Loose Part Monitoring System Channel Functional Test," the system engineer identified that the Digital Loose Part Locator (DLPL) circuit of the LPMS was in a "lockup" condition and could not be reset. It was then concluded that the LPMS was in apable of responding to a potential loose part event. The LPMS had entered a 30 day action requirement as required by TS Section 3.3.7.10 on December 14, 1990, when the Unit 1 Operational Condition (OPCON) was changed from OPCON 4 (Cold Shutdown) to OPCON 2 (Startup). As a result, on January 13, 1991, the 30 day time limit for returning the LPMS to operable status expired requiring the submittal of a Special Report in accordance with TS Sections 3.3.7.10 and 6.9.2. The cause of the malfunction has not yet been determined with certainty beyond recognizing that a faulty component in one of the DLPL printed circuit boards is the probable cause. A purchase requisition has been initiated to replace all the boards in the DLPL circuit. The new DLPL circuit boards are expected to be replaced by March 1, 1991, which will enable the LPMS to be returned to an operable condition.

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Reporting Requirements:

Technical Specifications (TS) Section 3/4.3.7.10, Loose-Part Detection System

TS Section 3.3.7.10 requires that, with one or more Loose-Part Detection System channels inoperable for more than 30 days, a Special Report must be prepared and submitted to the NRC in accordance with TS Section 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the channel(s) to operable status.

T3 Section 6.9.2, - Special Reports

TS Section 6.9.2 - Special reports shall be submitted to the Regional Administrator of the Regional Office of the NRC within the time period specified for each report.

Description of the Event:

On January 13, 1991, it was determined that the Limerick Generating Station (LGS) Unit 1 Loose-Part Monitoring System (LPMS) had been inoperable for more than 30 days requiring submittal of a Special Report in accordance with the requirements of TS Section 6.9.2. The LPMS is d. igned to detect and help locate the presence of loose or broken components within the Reactor Coolant System.

On December 5, 1990, during an independent verification of Surveillance Test (ST) procedure ST-2-036-640-1. "Loose Part Monitoring System Channel Functional Test," the system engineer identified that the Digital Loose Part Locator (DLPL) circuit of the LPMS had been in a "lockup" condition. The system engineer could not reset the DLPL either automatically or manually, and therefore it was concluded that the system was incapable of responding to a potential loose part event. The LPMS system was not declared inoperable at this time since the plant was in a shutdown mode of operation and this system is not required to be operable during shutdown conditions. The DLPL circuit is a digital logic driven subsystem of the LPMS which provides the notification of a potential loose part event by discriminating against spurious electrical signals and background noise.

Subsequent troubleshooting was performed by the Instrumentation & Controls (I&C) personnel to isolate the cause of the lockup in the DLPL circuit. The troubleshooting was unsuccessful and a decision was made to order all new printed circuit boards for the DLPL circuit. The vendor (Babcock & Wilcox) was contacted on December 17, 1990 to initiate purchase of the circuit boards. Subsequently, on January 3, 1991, 1&C personnel were informed by the vendor that the required components were not a stock item and would require up to 8 weeks to fabricate and deliver the components.

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The LPMS is required to be operable in Operational Condition (OPCON) 1 (Power Operation) and 2 (Startup). The LPMS entered a 30 day TS Action statement as required by TS Section 3.3.7.10 on December 14, 1990, when the Unit 1 OPCON was changed from OPCON 4 (Cold Shutdown) to OPCON 2 (Startup). As a result, on January 13, 1991, the 30 day time limit for returning the LPMS to operable status had expired requiring the submittal of a Special Report in accordance with the requirements of TS Sections 3.3.7.10 and 6.9.2.

Analysis of the Event:

There are no adverse consequences as a result of this event. There have been no indications of a loose part event during the time period that the IPMS has been inoperable. Had the Main Control Room operators suspected a loose part event during this time period or identified any system abnormalities during performance of the daily LPMS channel check, the capability to verify the presence of a loose part through the performance of an audio check of each channel of the LPMS was available to confirm any suspicions. Also, the ability to manually initiate recording of any four channels of the LPMS is still available.

Cause of the Malfunction:

The cause of the malfunction has not yet been determined with certainty beyond recognizing that a faulty component in one of three Printed Circuit Boards is the probable cause. There have been no other previous similar events experienced on his type of equipment at LGS and therefore, we have concluded that this malfunction is the result of a random equipment failure.

Corrective Actions:

The purchase requisition for the replacement printed circuit boards was initiated on January 3, 1991 by the system engineer. The new DLPL circuit boards are expected to be replaced by March 1, 1991, which will enable the LPMS to be returned to an operable condition.

Information will be provided to the operations personnel providing instructions for monitoring for loose parts until the LPMS is returned to an operable status.

To prevent recurrence of the delay in restoring the LPMS to operability, a plant stock level for every component that is not easily obtainable is expected to be established by February 15, 1991.