

Ted C. Feigenbaum President and Chief Executive Officer

NYN-92044

April 8, 1992

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

Attention:

Document Control Desk

References:

(a) Facility Operating License No. NPF-86, Docket No. 50-443

(b) NHY Letter NYN-92036 dated March 27, 1992 "Auxiliary Operator Performance Concerns" T. C. Feigenbaum to T. T. Martin

Subject:

Licensee Event Report (LER) 92-03-00: Missed Technical Specification Surveillance Requirements

### Gentlemen:

Enclosed please find Licensee Event Report (LEF), No. 92-03-00 for Seabrook Station. This submittal documents an event that was identified on March 9, 1392 and is being reported pursuant to 10CFR50.73(a)(2)(i)(B). The enclosed LER documents six instances on which Technical Specification Surveillance Requirements were documented to have been completed by Auxiliary Operators but which were subsequently determined to have not been properly conducted. These occurrences are currently being evaluated by the New Hampshire Yankee Independent Review Team (IRT) and New Hampshire Yankee Management. The initial identification of those occurrences and the short term corrective actions were transmitted to the NRC in a letter dated March 27, 1992 [Reference (b)]. NHY expects to transmit the IRT report to the NRC on April 10, 1992. This LER will be supplemented by May 9, 1992, to specify the findings of the IRT and Management.

Should you require additional 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

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United States Nuclear Regulatory Commission Attention: Document Control Desk

ce: Mr. Thomas T. Martin

Aegional Administrator

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Mr. Noel Dudley NRC Senior Resident Inspector P.O. Box 1149 Seabrook, NH 03874

INPO Records Center 1100 Circle 75 Parkway Atlanta, GA 30339

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During a periodic performance monitoring surveillance of on-shift personnel on March 1, 1992, it was determined that an Auxiliary Operator (AO) did not completely perform the AO watch rounds to which he was assigned. Auxiliary Operators do not require a reactor operator license. Auxiliary Operators perform routine inspection and surveillance activities in the plant under the direction of control room personnel. Subsequent extensive evaluation by the NHY Independent Review Team revealed other occasions on which AO's did not completely perform their assigned AO duties. On March 9, 1992 and during subsequent evaluation it was determined that AO performance concerns caused six Technical Specification Surveillance Requirements to be missed.

ABSTRACT (Limit to 1400 spaces, i.e., approximately fiftgen single-space typewritten lines) (18)

Technical Specification SURVEILLANCE REQUIREMENT 4.7.1.3 requires in part, that the integrity of the concrete structure which encloses the Condensate Storage Tank (CST)—verified at least once per 12 hours. Contrary to this requirement, the integrity of the CST enclare was not verified as required on August 25, 1990 (2 instances), December 22, 1990, May 12, 1991, and November 9, 1991.

Technical Specification SURVEILLANCE REQUIREMENT 4.7.10 requires that the temperature of areas listed in Table 3.7-3 be determined to be within its limit at least once per 12 hours. On February 21, 1992 this requirement was not met for the Fuel Storage Building Spent Fuel Pool Cooling Pump Area. This area is included in Table 3.7-3.

Immediate corrective actions include the removal of the involved AO's from watchstanding duties, briefing other Operations Department personnel on the importance of correctly completing rounds and the initiation of disciplinary action including suspension and/or termination of the involved AO's. In addition a special Independent Review Team was assigned to fully evaluate the AO performance centerns and to determine the root cause.

The root cause of this incident is presently being determined. The root cause and corrective actions will be provided in a supply nental report which is anticipated to be submitted by May 9, 1992.

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During a periodic performance monitoring surveillance of on-shift personnel on March 1, 1992, it was determined that an Auxiliary Operator (AO) did not completely perform the AO watch rounds to which he was assigned. Auxiliary Operators do not require a reactor operator license. Auxiliary Operators perform routine inspection and surveillance activities in the plant under the direction of control room personnel. Subsequent extensive investigation by the NHY Independent Review Team revealed other occasions on which AO's did not completely perform their assigned AO duties. On March 9, 1992 and during subsequent investigation it was determined that AO performance concerns caused six Technical Specification Surveillance Requirements to be missed.

Seabrook Station Technical Specification 3.7.1.3 requires the Condensate Storage Tank (CST) [TK] and the concrete CST enclosure to be OPERABLE in MODES 1, 2, and 3. OPERABLE is defined as the CST containing a minimum volume of 212,000 gallons of water and the CST enclosure being capable of retaining the 212,000 gallons of water in the event of a tank failure.

On the following dates the requirement to verify that the CST enclosure was capable of containing 212,000 gallons of water was not performed: August 25, 1990 (2 instances), December 22, 1990, May 12, 1991, and November 9, 1991. This requirement is defined in Surveillance Requirement: 4.7.1.3.

Seabrook Station Technical Specification 3.7.10 specifies maximum temperatures for certain areas in the plant. Technical Specification SURVEILLANCE REQUIREMENT 4.7.10 requires that the temperature of the area be determined to be within its limit at least once per 12 hours. On February 21, 1992 this surveillance requirement was not performed for the Fuel Storage Building Spent Fuel Pool Cooling Pump Area.

CST enclosure integrity and FSB temperature are obtained every 4 hours as part of routine log taking associated with various Auxiliary Operator (AO) which stations. The logs for the AO watches indicated that the areas had been checked. However, a entirparison of these logs with the security keycard transaction log indicated that the AO's involved had not made entry into the buildings. Therefore, verification of CST integrity and FSB temperature could not have occurred.

### Background

The CST is the source of demineralized water for the Emergency Feedwater System (EFW) [BA]. The CST enclosure is a two foot thick concrete structure which surrounds the CST two inches from the tank. The enclosure provides tornado missile protection and ensures that the minimum amount of water required by Technical Specifications would be available in the unlikely event of a tank failure.

The Fuel Storage Building (FSB) [ND] is the building which encloses the following areas: new fuel storage, spent fuel pool cooling equipment [DA], HVAC equipment [VG] and spent itel handling [DF] and storage facilities.

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## Corrective Action

Immediate corrective actions include the removal of the involved AO's from watchstanding duties, briefing other Operations Department personnel on the importance of correctly completing rounds and the initiation of disciplinary action including suspension or termination of the involved AO's. In addition the NHY Independent Review Team was assigned to fully evaluate the AO performance concerns and to determine the root cause.

# Root Cause

The root cause of this problem is presently being determined. The root cause and long term corrective actions will be provided in a supplemental report which is anticipated to be submitted by May 9, 1992.

# Safety Significance

There was no significant safety impact as a result of the missed CST integrity and FSB area temperature surveillance.

The integrity of the CST enclosure was verified prior to, and subsequent to the missed surveillances, therefore it existed during the time the surveillances were missed.

The temperature of the FSB SFP Cooling Pump Area was verified to be within its limit prior to, and subsequent to the missed surveillance. It is highly unlikely that 'he area temperature rose above the specified limit for the short period of time that the surveillance was missed and then returned to normal. The temperature for this area has historically been steady and was verified by surveillance to be in its normal band prior to and following the missed surveillance.

At the time of the discovery the plant was in MODE 1.

This is the first event of this type at Seabrook Station.