

GULF STATES UTILITIES COMPANY

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REA CODE 504 035 E054 346-805

November 25, 1991 RBG- 36008 File Nos. G9.5, G9.25.1.3

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

Gentiemen:

# River Bend Station - Unit 1 Docket No. 50-458

Please find enclosed Licensee Event Report No. 91-019 for River Bend Station -Unit 1. This report is submitted pursuant to 10CFR50.73.

Sincerely,

W.H. Odeil Manager - Oversight River Bend Nuclear Group

E/PDG/GAB/DCK/CLM/kvm

cc: U.S. Nuclear Regulatory Commission 611 P van Plar\* Drive, Suite 400 Arling.Cr. TX 76011

> NRC Resident Inspector P.O. Box 1051 St. Francisville, LA 70775

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Mr. C.R. Oberg Public Utility Commission of Texas 7800 Shoal Creek Blvd., Suite 400 North Austin, TX 78757

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STP on 10/28/91 verified that the monitor was functional during this timeframe and was capable of performing its intended safety function per design.

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### REPORTED CONDITION

At 2050 on October 26, 1991, with the reactor in Operational Condition 2 (Startup), operations personnel discovered that surveillance test procedure (STP)-511-4516, a quarterly STP which concerns the radwaste building ventilation exhaust duct noble gas activity monitor, had not been completed within the required Technical Specification time frame. Operations personnel reviewed the Technical Specification requirements under Section 3.3.7.11.b-4a, declared the monitor incperable and entered the action statement requiring chemistry sampling under a limiting condition for operation (LCO). The STP was successfully performed by 2300 hours on 10/28/91. To document the non-compliance with the surveillance requirement, this report is submitted pursuant to 10CFR50.73(a)(2)(i)(B) as operation prohibited by the Technical Specifications.

### **INVESTIGATION**

At 2050 on October 26, 1991, STP-511-4516 was discovered to be overdue based on the Technical Specification surveillance interval requirement and verification of the date and time of the previous performance. This STP is the guarterly channel functional test for Technical Specification surveillance requirement 4.3.7.11-1.4a, d and e which states that a channel functional test will be performed for the radwaste building ventilation exhaust monitoring system (1RMS\*RE6A and 6E) noble gas activity monitor, flow rate monitor and sample flow rate monitor on a quarterly frequency. On 09/27/91 at 0815, 1RMS\*RE6A failed a source check test and was declared inoperable with 1RMS\*RE6B also being inoperable due to a broken sample pump. Operations personnel initiated an LCO which required chemistry sampling to be performed while both monitors were inoperable. The scheduled due date for STP-511-4516 on 1RMS\*RE6A was 09/30/91. On 09/30/91, with both monitors inoperable and Operations in compliance with the requirer echnical Specification actions, a test exception was taken with tolerance expiration date of 10/12/91. The investigation revealed that the test exception information was never transferred to the LCO in the control room. Following maintenance rework of 1RMS\*RE6A (MWO R169416) on 10/5/91, operations declared the monitor operable and cleared the LCO at 0540 hours on 10/6/91 unaware of the outstanding test exception drop dead date of 10/12/91. Operation's review of the STP exception report on 10/26/91 indicated that 1RMS\*RE6A was operable; however, the STP should have been performed by 10/12/91. Immediately upon discovery, Operations declared the monitor inoperable and initiated a new LCO to comply with the Technical Specification action requirements for chemistry sampling. Instrumentation and controls (I&C) personnel subsequently completed a satisfactory performance of STP-511-4516 on 10/28/91.

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## ROOT CAUSE

Based on a task analysis of this event and personnel interviews, the root cause for missing the scheduled performance due date was personnel error which involved two primary causal factors, self-checking and verbal communications between the I&C foreman and personnel in the control room. The self-checking and verbal communication problems were identified when it was determined that the test exception was not identified on the original LCO. It is currently the responsibility of the I&C foreman to ensure that the control room is notified of any test exceptions and that the test exception is identified on any applicable LCOs. The interviews with the I&C foreman indicated a lack of awareness for this responsibility and it was also not clear whether verbal communications between the I&C foreman and the control room were adequate for verification or if physical review of the LCO was required.

Although not a primary causal factor, a written communications deficiency was identified when it was determined that the test exception form did not include a signature line for the Control Operating Foreman or Shift Supervisor to acknowledge that the test exception was added to any applicable LCOs.

A review of previous events revealed LERS 91-011 and LER 91-015 that involved missed surveillances. In LER 91-011, a secondary containment surveillance was not completed within 24 hours prior to fuel movement. A comparison of LER 91-011 to this event (LER 91-019) revealed no similarity between causal factors. In LER 91-015, a monthly surveillance on the reactor coolant system sump drain flow monitoring instrumentation was missed due to the failure of an I&C foreman to properly review the nightly turnover log and due to a communications deficiency increase the day shift foreman and night shift foreman. The causal factors in LER 91-015 are identical to this event (LER 91-019); however, the conditions leading to the missed STPs are different.

### CORRECTIVE ACTION

As part of continuing training, all plant staff personnel responsible for surveillance testing will be briefed on this event and thei. responsibility to properly nocify the control room of test exceptions. To prevent recurrence, a signoff line for the Control Operating Foremen/Shift Supervisor will be added to the test exception form for acknowledgement that the test exception was added to any applicable LCOs.

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### SAFETY ASSESSMENT

The purpose of STP-511-4516 is to perform a channel functional test of the radwaste building ventilation exhaust duct noble gas activity monitors. With both monitors inoperable, chemistry sampling per the Technical Specification action statements is required. On 10/05/91, the IEMS\*RE6A monitor was declared operable following maintenance rework. The late due date for the STF was 10/12/91. Between 10/12/91 and 10/26/91 (dates of discovery and restoration of compliance with Technical Specification requirements) the monitor was administratively inoperable; however, satisfactory performance of the STP on 10/28/91 verified that the monitor was functional during this timeframe and was capable of performing its intended safety function per design.