(7-77)

LICENSEE EVENT REPORT

CONTROL BLOCK: [| | | | |] (1) (PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

Field	Value
01 Licensee Code (2)	W I P B H 2
License Number (3)	0 0 - 0 0 0 0 0 - 0 0
License Type (4)	4 1 1 1 1
CAT (5)	
CON'T 01 Report Source (6)	L
Docket Number (7)	0 5 0 0 0 3 0 1
Event Date (8)	0 4 2 4 8 4
Report Date (9)	0 5 2 4 8 4

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

On 04/24/84, the NRC Resident Inspector notified the Licensee that he considered operation with the control rods at 225 steps a violation of TS's. TS 15.3.10.A states that the shutdown bank shall be fully withdrawn and the control banks inserted no further than as indicated in Figure 15.3.10-1. Figure 15.3.10-1 calls for control banks "B&C" to be at 228 steps for 100% power. This event is considered reportable under TS 15.6.9.2.B.2.

System Code (11)	Cause Code (12)	Cause Subcode (13)	Component Code (14)	Comp Subcode (15)	Valve Subcode (16)
RB	E	X	CONROD	Z	Z

(17) LER/RO Report Number

Event Year		Sequential Report No.		Occurrence Code	Report Type		Revision No.
84	—	002	/	03	L	—	0

Action Taken (18)	Future Action (19)	Effect on Plant (20)	Shutdown Method (21)	Hours (22)	Attachment Submitted (23)	NPRD-4 Form Sub. (24)	Prime Comp. Supplier (25)	Component Manufacturer (26)
E	X	Z	Z	0000	Y	N	Z	Z999

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)

The control rods were inspected during the last refueling outage and found to be wearing at the guide card locations. To prevent further wall loss in the same area, the fully withdrawn position was changed from 228 to 225 steps. Control banks "A, B & C" were returned to 228 steps upon being notified and a TS change request filed to change Figure 15.3.10-1.

Facility Status (28)	% Power (29)	Other Status (30)	Method of Discovery (31)	Discovery Description (32)
E	100	N/A	Z	N/A

Activity Released (33)	Content of Release (34)	Amount of Activity (35)	Location of Release (36)
Z	Z	N/A	N/A

Personnel Exposures

Number (37)	Type (38)	Description (39)
000	Z	N/A

Personnel Injuries

Number (40)	Description (41)
000	N/A

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Loss of or Damage to Facility (43)

Type (42)	Description
Z	N/A

8406050431 840524
PDR ADOCK 05000301
S PDR

Publicity

Issued (44)	Description (45)
N	N/A

NRC USE ONLY

NAME OF PREPARER: C. W. Fay

PHONE: 414/277-2811

GPO 917-926

ATTACHMENT TO LICENSEE EVENT REPORT NO. 84-002/03L-0

Wisconsin Electric Power Company
Point Beach Nuclear Plant, Unit 2
Docket No. 50-301

During Unit 2 Refueling 9 (April 1983 - July 1983), an inspection of the rod cluster control assemblies (RCCA's) was performed. The inspection identified that wear was occurring on RCCA rodlets at the guide card locations in the RCCA guide tubes. A qualitative evaluation of the data from the inspection was done and it was decided to replace two RCCA's prior to startup. In addition, Westinghouse recommended that two other RCCA's be located in a shutdown bank location in a quadrant away from crossflows. All the other RCCA's were judged acceptable for continued operation during the next cycles. However, it was recommended that they, along with the other RCCA's, be relocated axially to 225 steps versus 228. Relocating the RCCA's at a different axial location was considered prudent in order to minimize additional vibratory wear in axial locations which have already exhibited some degree of wear. Westinghouse Nuclear Fuels Division, Nuclear Engineering Section, had determined that these minor step changes would have a negligible impact on the operation of the plant.

Prior to returning Unit 2 to service in July 1983, the Point Beach Nuclear Plant Manager's Supervisory Staff reviewed and accepted the core reload analysis for the coming cycle. As part of their evaluation, they considered the impact of operating with the RCCA's located at 225 steps versus 228. It was determined that operating with the RCCA's at 225 steps versus 228 has a negligible effect on total rod worth and that sufficient shutdown margin exists at both beginning-of-life and end-of-life to meet safety analysis values. The Staff concluded that the basis for Technical Specification 15.3.10.A, "Bank Insertion Limits", requirements would be met for Unit 2 Cycle 10 with the RCCA's at 225 steps, and thus defined 225 steps as the fully withdrawn position for Unit 2 Cycle 10. On August 18, 1983 Mr. C. W. Fay, Vice President-Nuclear Power, sent a letter to Mr. H. R. Denton relating the control rod wear results and informed him that we had repositioned the control rods.

However, due to an oversight, Technical Specification Figure 15.3.10-1 was not changed. This led to the subject situation when on April 24, 1984 the NRC Resident Inspector noted the discrepancy and notified Point Beach management that the current operational mode was in violation of this literal interpretation of the Technical Specification. Upon being notified, control banks "A", "B", and "C" were withdrawn to 228 steps within the time frame allowed by Technical Specification 15.3.0 to restore conditions not allowed by Technical Specifications. In addition, a Technical Specification change request will be filed to modify Figure 15.3.10-1.

Although Unit 2 was operated in a condition not in strict accordance with the Technical Specifications, the condition did fulfill the Technical Specification basis and was within the bounds of the safety analysis. Thus, the public health and safety was not compromised. Wisconsin Electric considers this event an administrative oversight since a technical review which determined the condition as acceptable had been performed.

It should be pointed out that the inability to expeditiously process a Technical Specification modification upon discovery of the situation resulted in the plant being placed into a mode of operation which, while adequately safe, was technically less desirable. Our letter of May 24, 1984 in response to Inspection Report Nos. 50-266/84-04 and 50-301/84-03 describes another situation which had the same result.

The NRC Resident Inspector is aware of this event and our response.

DMB

Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

May 24, 1984

Mr. J. G. Keppler, Regional Administrator
Office of Inspection and Enforcement,
Region III
U. S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

DOCKET NO. 50-301
LICENSEE EVENT REPORT NO. 84-002/03L-0
WITHDRAWN POSITION OF CONTROL RODS
POINT BEACH NUCLEAR PLANT, UNIT 2

Enclosed is Licensee Event Report No. 84-002/03L-0 (a 30-day report) with an attachment which provides a description of an event regarding the operation of the control bank RCCA's which is reportable in accordance with Technical Specification 15.6.9.2.B.2, "conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation".

In accordance with our understanding of the supplemental information regarding Licensee Event Reporting provided in NUREG-1022 and at the Commission's Licensee Event Report workshops, this event is being reported using NRC Form 366, Revision 7-77, since this event, although not discovered until April 24, 1984, first occurred in 1983 and would not be otherwise reportable under the criteria which became effective on January 1, 1984.

Very truly yours,

C W Fay

Vice President-Nuclear Power

C. W. Fay

Attachment

Copy to NRC Resident Inspector

IE22
1/1
MAY 29 1984