



Callaway Plant

February 18, 1992

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

ULNRC-2559

Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
FACILITY OPERATING LICENSE FFF-30
' CENSEE EVENT REPORT 92-001-00
'A' TRAIN EMERGENCY EXHAUST SYSTEM
INCOMPLETE SURVEILLANCE DUE TO A HUMAN PERFORMANCE ERROR

The enclosed Licensee Event Report is submitted pursuant to 10 CFR 50.73(a)(2)(1)(B) concerning operation of the Callaway Plant with a condition prohibited by the plant's Technical Specifications. The Emergency Exhaust System was not run a full ten hours as required by the monthly Technical Specification surveillance 4.7.7.a.

Blosser
J. D. Blosser
Manager, Callaway Plant

JDB/TPS/JGB/lrj

Enclosure

cc: Distribution attached

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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-52), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1): Callaway Plant Unit 1
DOCKET NUMBER (2): 0 5 0 0 0 4 8 3 1 OF 0 3

TITLE (4): 'A' Train Emergency Exhaust System Incomplete Surveillance Due To A Human Performance Error

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 NAMES
09	12	91	92	001	00	02	18	92	
								DOCKET NUMBER(S): 0 5 0 0 0	

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5 (Check one or more of the following) (11)

OPERATING MODE (9): 1	20.402(b)	20.405(i)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10): 9.3	20.405(a)(1)(i)	50.36(a)(1)	50.73(a)(2)(v)	73.71(c)
	20.405(a)(1)(ii)	50.36(a)(2)	50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	20.405(a)(1)(iii)	X 50.73(a)(2)(ii)	50.73(a)(2)(vii)(A)	
	20.405(a)(1)(iv)	50.73(a)(2)(iii)	50.73(a)(2)(vii)(B)	
	20.405(a)(1)(v)	50.73(a)(2)(iv)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12):
NAME: Dale E. Young, Superintendent, Operations
TELEPHONE NUMBER: 3 1 1 4 6 7 1 5 - 1 8 2 0 1 6

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFAC TURE	REPORTABLE TO NRPDS	CAUSE	SYSTEM	COMPONENT	MANUFAC TURE	REPORTABLE TO NRPDS

SUPPLEMENTAL REPORT EXPECTED (14):
 YES (If yes, complete EXPECTED SUBMISSION DATE):
 NO
EXPECTED SUBMISSION DATE (15):

ABSTRACT (Limit to 1400 spaces, i.e. approximately fifteen single-space typewritten lines) (16)

On 1/21/92, a utility Quality Assurance engineer discovered flow had not been maintained through the 'A' Train Emergency Exhaust for the required 10 hours during a Technical Specification (T/S) 4.7.7.a monthly surveillance on 9/12/91. On 9/12/91 at 0108 CDT, licensed operators performed the T/S 4.7.7.a surveillance for only 9 hours and 21 minutes. The plant was in Mode 1-Power Operation, 93 percent reactor power at the time of the event.

The root cause of this event is cognitive human performance error during the completion and review of the surveillance procedure Acceptance Criteria Data Sheet. This Data Sheet did not include the 10 hour acceptance criteria nor require the total run time be calculated and recorded.

The individuals involved have been instructively coached and they have revised the Emergency Exhaust surveillance procedure to add the 10 hour T/S acceptance criteria and run time calculation steps to the Acceptance Criteria Data Sheet. Other similar T/S surveillance procedures were reviewed. One was revised to require the calculated total run time to be recorded. This event will be included in licensed operator requalification training.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20545, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Callaway Plant Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 8 3	LER NUMBER (8)			PAGE (3)		
		YEAR 9 2	SEQUENTIAL NUMBER 0 0 1	REVISION NUMBER 0 0	0 2	OF	0 3

TEXT (if more space is required, use additional NRC Form 306A's) (17)

BASIS FOR REPORTABILITY:

Technical Specification (T/S) 4.7.7.a states that "each Emergency Exhaust System⁽¹⁾ shall be demonstrated operable at least once per 31 days on a staggered test basis by initiating, from the Control Room, flow through the HEPA filters⁽²⁾ and charcoal absorbers and verifying that the system operates for at least 10 continuous hours with the heaters operating." On 1/21/92, it was discovered by a utility Quality Assurance (QA) engineer that during a T/S 4.7.7.a monthly surveillance on 9/12/91, flow had been maintained through the 'A' Train Emergency Exhaust for only 9 hours and 21 minutes. Since the system was not operated for 10 continuous hours, this report is submitted pursuant to 10CFR50.73(a)(2)(1)(B) to report a condition prohibited by the plant's T/S.

CONDITION AT TIME OF EVENT:

Mode 1 - Power Operations, Reactor Power at 93% for repair of tube leaks in the '1B' low pressure feedwater heater.⁽³⁾

DESCRIPTION OF EVENT

On 9/12/91 at 0108 CDT, a T/S 4.7.7.a surveillance of the 'A' Emergency Exhaust System was commenced by a licensed utility Reactor Operator per surveillance procedure OSP-GG-00001, "Emergency Exhaust System Operability Test". At 1206 on 9/12/91, a licensed Senior Reactor Operator signed a surveillance completion form indicating the completed surveillance satisfied the required acceptance criteria. On 1/21/92, a utility QA engineer discovered during a routine, periodic review of completed surveillance Acceptance Criteria Data Sheets, that the 'A' Train Emergency Exhaust System was operated for only 9 hours and 21 minutes. This review included complete documentation for 50 other performances of this surveillance. The acceptance criteria was met for these other surveillances.

ROOT CAUSE:

The root cause of this event is cognitive human performance error by a licensed utility Reactor Operator when calculating the stop time for the surveillance test. A contributing factor was the failure of the licensed Senior Reactor Operator to identify the inadequate run time when reviewing the Acceptance Criteria Data Sheet to determine if it met the procedure's acceptance criteria. This Data Sheet did not include the acceptance criteria of 10 hours nor require the total run time to be calculated and recorded.

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 RECORDS AND REPORTS MANAGEMENT BRANCH (F-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Callaway Plant Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 8 3	LER NUMBER (6)			PAGE (3)		
		YEAR 9 2	SEQUENTIAL NUMBER — 0 1 1	REVISION NUMBER — 0 0			

TEX: If more space is required, use additional NRC Form 366A's (17)

CORRECTIVE ACTION:

1. The individuals involved have been instructively coached and they have revised the procedure as noted below. This event will be included in licensed operator requalification training.
2. The surveillance procedure, OSP-GG-00001, has been changed to add the 10 hour T/S acceptance criteria to the Acceptance Criteria Data Sheet. Steps have been added to the data sheet to actually calculate and record the run time.
3. Other similar T/S surveillance procedures requiring a specific run time were reviewed. One of these required revision to add the calculated total run time.

SAFETY SIGNIFICANCE:

The 9/12/91 surveillance run time of 9 hours and 21 minutes did verify the proper functioning of the 'A' Train Emergency Exhaust System. The same monthly surveillance was performed satisfactorily on 10/10/91 and thereafter. All equipment functioned as required by plant design. This event posed no threat to the health or safety of the public.

PREVIOUS OCCURRENCES:

None.

FOOTNOTES

The system and component codes listed below are from IEEE Standard 805-1984 and 803A-1984, respectively.

- (1) System VG
- (2) System VG, Component FLT
- (3) System SJ, Component HX