

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) **Oyster Creek, Unit 1** DOCKET NUMBER (2) **0 5 0 0 0 2 1 1 9** PAGE (3) **1 OF 0 1 3**

TITLE (4) **Reactor Low Water Level Surveillance Performed Late**

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		DOCKET NUMBER(S)						
0 5	3	0 8	4 8	4	0 1	4	0 0	0 6	2	7	8	4	0 5	0 0	0 0		
											0 5	0 0	0 0				

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

OPERATING MODE (9) <b>N</b>	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
POWER LEVEL (10) <b>0 1 0 1 0</b>	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(e)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(e)
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(e)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 356A)
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(vii)(A)	
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(vii)(B)	
	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12) **Michael J. Fitzgerald, Operations Engineer** TELEPHONE NUMBER **6 0 9 9 7 1 - 4 8 9 6**

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

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

EXPECTED SUBMISSION DATE (15) MONTH DAY YEAR

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

The test of the Reactor Low Level instrumentation was not performed within the time period required in the Technical Specifications. It was scheduled to be performed on April 9, 1984 and May 7, 1984. It was performed early in April (April 4) and late in May (May 15). This event was discovered on May 30, 1984 during the course of normal review of surveillances within the maintenance organization. The event is attributed to personnel error. The involved personnel have been instructed on their responsibilities as outlined in the procedure which implements the surveillance test program.

8407090154 840627  
PDR ADOCK 05000219  
S PDR

IE22  
4/1

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)  Oyster Creek, Unit 1	DOCKET NUMBER (2)  0 5 0 0 0 2 1 9 8 4	LER NUMBER (8)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		— 0 1 4	— 0 1 0		0 2	OF	0 3

TEXT (if more space is required, use additional NRC Form 388A's) (17)

DATE OF OCCURRENCE

The event was identified on May 30, 1984 at approximately 1630 hours.

IDENTIFICATION OF OCCURRENCE

The surveillance of the Reactor Low Water Level instrumentation was performed outside of the time interval specified in Table 4.1.1, item 3, of the Technical Specifications and the allowable extension of 25 percent of the surveillance interval.

This event is considered to be a reportable occurrence as defined in 10 CFR 50.73(a)(2)(i)(B).

CONDITIONS PRIOR TO OCCURRENCE

The reactor mode switch was in REFUEL with the reactor vessel head removed. The reactor cavity was flooded and < 212°F.

DESCRIPTION OF OCCURRENCE

On April 4, 1984, the "Reactor Low Level Test and Calibration" was performed in order to support refueling operations. This procedure has a requirement for monthly performance in order to satisfy Table 4.1.1, item 3, of the Technical Specifications. The scheduled date of performance on the Master Surveillance Schedule was April 9, 1984. An omission form for the test on April 9, 1984 was submitted since the test had been performed five days earlier. The omission form stated that the test would be performed on the next scheduled date. The test was next due on May 7, 1984, but was not performed until May 15, 1984. The time period between these two tests was 41 days, which exceeded the Technical Specifications surveillance interval and allowable extension (25 percent) of 37 days.

APPARENT CAUSE OF OCCURRENCE

The cause of the occurrence is attributed to personnel error. The procedure which governs the surveillance test program states that the

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)  Oyster Creek, Unit 1	DOCKET NUMBER (2)  0 5 0 0 0 2 1 9 8 4 - 0 1 4 - 0 1 0 0 3 OF 0 3	LER NUMBER (5)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		

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

department performing the surveillance also verifies that the test is performed within the required time period. If the Master Schedule is followed, the specified intervals are met. If the test is done on a different day than the scheduled day, the responsible department is required to review past test dates to determine the latest date that the surveillance may be performed. This was not done in this case and the required performance date was exceeded. A contributing factor in this event was a departmental reorganization on May 7, 1984, which assigned the responsibility for performance of surveillances to a newly formed Operational Maintenance group.

ANALYSIS OF OCCURRENCE and SAFETY ASSESSMENT

The safety significance of this event is minimal. The procedure in question tests the operability of the Reactor Low Water Level instrumentation. The major purpose of this instrumentation is to initiate a reactor scram. During the present plant conditions, all control rods are fully inserted. In addition, the surveillance was performed satisfactorily, although four days late.

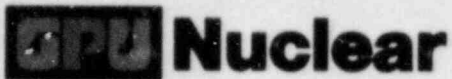
It should be also pointed out that the area of concern with this event is not programmatic. The scheduling of Technical Specification surveillances is governed by the Master Surveillance Schedule. The Administration of the Surveillance Test Program is governed by an approved Station Procedure, which specifies responsibilities of individual departments for performance and review of surveillance tests and test data. The error in this event was in the implementation of the programmatic requirements and not in the lack of programmatic requirements.

CORRECTIVE ACTION

The surveillance procedure was performed on May 15, 1984. The personnel involved have been instructed on their responsibilities as part of the Surveillance Test Program. They have been instructed on the importance of reviewing the performance dates of surveillance procedures when a test is not performed on its scheduled date.

Previous LERs on the similar subject:

- 82-008 (improper administrative and procedural controls)
- 82-038 (improper administrative and procedural controls and personnel error)
- 82-063 (personnel error)



**GPU Nuclear Corporation**  
Post Office Box 388  
Route 9 South  
Forked River, New Jersey 08731-0388  
609 971-4000  
Writer's Direct Dial Number:

June 27, 198<sup>A</sup>

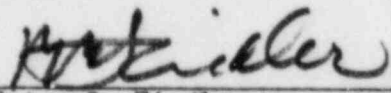
U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Licensee Event Report

This letter forwards one (1) copy of Licensee Event Report (LER)  
No. 84-014.

Very truly yours,

  
\_\_\_\_\_  
Peter B. Fiedler  
Vice President and Director  
Oyster Creek

PBF:dsm  
Enclosures

cc: Dr. Thomas E. Murley, Administrator  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

NRC Resident Inspector  
Oyster Creek Nuclear Generating Station  
Forked River, NJ 08731