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Nuclear Power Plant
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**New York Power
Authority**

Harry P. Salmon, Jr.
Site Executive Officer

October 26, 1995
JAFFP-95-0469

United States Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

SUBJECT: DOCKET NO. 50-333
LICENSEE EVENT REPORT: LER-95-014

RCIC Auto Isolation Instrument Channel Functional Tests
Missed Due to Personnel Error

Dear Sir:

This report is being submitted in accordance with 10 CFR
50.73(a)(2)(i)(B), "Any operation or condition prohibited by the
plant's Technical Specifications".

There are no commitments contained in this report.

Questions concerning this report may be addressed to Mr. Gordon
Brownell at (315) 349-6360.

Very truly yours,

HARRY P. SALMON, JR.

HPS:GB:las

cc: USNRC, Region I
USNRC Resident Inspector
INPO Records Center

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CLF# 2059447891

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LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-8 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20565-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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TITLE (4)
RCIC Auto Isolation Instrument Channel Functional Tests Missed Due to Personnel 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 NAME	DOCKET NUMBER
09	26	95	95	-- 014	-- 00	10	26	95	NA	05000
OPERATING MODE (9) N			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10) 100			20.2201(b)			20.2203(a)(2)(v)		X	50.73(a)(2)(i)	50.73(a)(2)(viii)
			20.2203(a)(1)			20.2203(a)(3)(i)			50.73(a)(2)(ii)	50.73(a)(2)(x)
			20.2203(a)(2)(i)			20.2203(a)(3)(ii)			50.73(a)(2)(iii)	73.71
			20.2203(a)(2)(ii)			20.2203(a)(4)			50.73(a)(2)(iv)	OTHER
			20.2203(a)(2)(iii)			50.36(c)(1)			50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)			50.36(c)(2)			50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME Mr. Gordon Brownell, Senior Licensing Engineer	TELEPHONE NUMBER (Include Area Code) (315) 349-6360
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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)				EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE.)	X	NO					

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On 09/26/95, while performing a scheduled review of the Instrument and Controls (I&C) Department Surveillance Test Program, an I&C supervisor discovered that Instrument Surveillance Procedure ISP-150A, "Reactor Core Isolation Cooling (RCIC) Auto Isolation Instrument Functional Test/Calibration" had not been performed within the Technical Specifications (T.S.) required surveillance test interval. T.S. Table 4.2-2 requires a once per month functional test of trip functions for the isolation of RCIC. The T.S. test interval (including a 25 percent extension period allowed by T.S. 4.0.B) was found to have been exceeded on 09/21/95. At the time of this discovery, the mode switch was in the run position with the plant operating at approximately 100 percent rated power.

The cause for the missed surveillance was personnel error.

Corrective actions included: satisfactory completion of the surveillance test, review of test documentation to assure no other surveillances were missed, and conduct of department briefings to examine and develop resolution of the causes for this event.

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

EVENT DESCRIPTION

Instrument Surveillance Procedure ISP-150A, "Reactor Core Isolation Cooling (RCIC) Auto Isolation Instrumentation Functional Test/Calibration" for the Analog Transmitter Trip System (ATTS) is one of a number of tests that are completed to satisfy the surveillance requirements for the monthly functional testing of instrumentation identified in Technical Specifications (T.S.) Table 4.2-2 (Minimum Test and Calibration Frequency for Core and Containment Cooling Systems).

On September 8, 1995, the Instrument and Controls (I&C) Department surveillance coordinator generated a weekly surveillance test schedule which included a task sheet for the performance of procedure ISP-150A. The schedule, referencing ISP-150A, was submitted to the I&C supervisor. A copy of the schedule and task sheet was submitted to the assigned lead I&C technician. On September 10, 1995, during preparation to perform the test, the technician erroneously selected a working copy of procedure ISP-150B (rather than ISP-150A). Test procedure ISP-150B was subsequently successfully completed. During the test acceptance review and signature process, the error in performing the wrong procedure was not detected resulting in the task sheet for ISP-150A being incorrectly signed. This completed signed task sheet was then used by the I&C Department surveillance coordinator to update the computer surveillance schedule resulting in procedure ISP-150A to appear to have been completed on schedule.

Scheduled reviews of the I&C Department Surveillance Test Programs are conducted by I&C staff in accordance with procedure ICSO-14, "Instrument and Controls Department Surveillance Program Assessment". The purpose of this procedure is to provide routine periodic reviews of the I&C surveillance program to ensure tests have been included on the test schedules and have been completed on time.

On September 26, 1995, while performing this review, an I&C supervisor discovered that Instrument Surveillance Procedure ISP-150A had not been performed within Technical Specifications required surveillance test interval. T.S. Table 4.2-2 requires a once per month functional test of trip functions for the isolation of the RCIC steam supply line. The T.S. required test interval (including the 25 percent extension period allowed by T.S. Section 4.0.B) was found to have been exceeded on September 21, 1995. At the time of this discovery, the plant mode switch was in the run position with the plant operating at approximately 100 percent rated power.

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CAUSE OF EVENT

The cause for the failure to complete surveillance procedure ISP-150A within T.S. required interval was attributed to personnel error (Cause Code A). Opportunities existed during the test preparation, supervision, review and acceptance processes to identify the performance of the wrong surveillance. However, I&C supervisors and technicians assigned these responsibilities failed to note the condition.

ANALYSIS

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B), which requires Licensees to report "any operation or condition prohibited by the plant's Technical Specifications". The T.S. functional test frequency for the "A" channel of the RCIC Auto Isolation Analog Transmitter Trip System, performed by procedure ISP-150A, is once per month plus a 25 percent extension period as allowed by T.S. section 4.0.B. The last acceptable date for this test was September 21, 1995. Instrument Surveillance Procedure ISP-150A was not completed until September 26, 1995. This resulted in a condition prohibited by Technical Specifications Table 4.2-2 surveillance requirement.

The function of the RCIC Auto Isolation ATTS system is to process analog variables (e.g. steam line flow) and provide bistable output when the variable deviates from a predetermined setpoint. The system implementation utilizes analog comparators (Trip Units) to drive the RCIC Isolation logic circuits.

The RCIC Auto Isolation Analog Trip System Trip Functions are periodically tested to demonstrate that they are capable of performing their intended functions. The monthly completion of procedure ISP-150A provides assurance that instrumentation located in "A" analog trip channel of the RCIC isolation logic function as designed.

Following the completion of ISP-150A on September 26, 1995, no deficiencies or unsatisfactory conditions were found.

This event was not safety significant. Satisfactory completion of ISP-150A demonstrated that in the event of a valid "A" channel RCIC isolation signal, the system would have functioned as designed. In addition, redundant instrumentation associated with the "B" channel RCIC isolation was operable with up-to-date surveillance. It should be also noted that T.S. Amendment 227 changes the Functional Test Surveillance interval for the channels of concern from monthly to quarterly (once every 92 days). T.S. Amendment 227 was issued on September 11, 1995 with implementation required by January 19, 1996. This T.S. Amendment is based on reliability analysis which demonstrates that monthly functional testing is not necessary.

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CORRECTIVE ACTION

1. Instrument Surveillance Procedure ISP-150A was successfully completed on September 26, 1995.
2. A review of the surveillance test program was performed to assure the circumstance surrounding this event was an isolated case. No additional missed surveillance tests were identified.
3. An I&C Department meeting was conducted following the event. The less than adequate I&C technician and supervisor work practices which led to the missed surveillance were reviewed and evaluated to demonstrate the importance of attention to detail no matter what the work evolution involves.
4. The I&C Department's computer surveillance test schedule is now updated based on the I&C surveillance coordinator verifying correct surveillance test procedure performance (rather than task sheet).
5. I&C Department personnel involved in the performance of the incorrect surveillance test evolution, which resulted in the condition prohibited by T.S., have been counselled on their less than adequate performance and the importance of attention to detail.

ADDITIONAL INFORMATION

1. Failed Components - NONE
2. System and Component Identification:

<u>SYSTEM - COMPONENT</u>	<u>IEEE 803A</u>	<u>EIIS</u>
Reactor Core Isolation Cooling System	n/a	BN
3. Previous Similar Events: LERs 90-008, 92-020, 93-011, 93-016, 94-003, and 95-012 describe similar events in which a required surveillance was missed due to personnel error.