Commonwealth Edison Company LaSalle Generating Station 2601 North 21st Road Marseilles, IL 61341-9757 Tel 815-357-6761



November 9, 1995
United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Licensee Event Report #95-017-00, Docket #050-373 is being submitted to your office in accordance with 10CFR50.73 (a) (2) (i) (B).

Sincerely,

D. J. Ray

Station Manager

LaSalle County Station

DJR/WCK/lja

Enclosure

cc: H. J. Miller, NRC Region III Administrator

P. G. Brochman, NRC Senior Resident Inspector

R. J. Zuffa, IDNS Resident Inspector

F. Niziolek, IDNS Senior Reactor Analyst

INPO - Records Center

D. L. Farrar, Nuclear Regulatory Services Manager

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

(If yes, complete EXPECTED SUBMISSION DATE).

At 1445 hours on October 10, 1995, during a Safety Related Contact Testing Adequacy (SRCTA) review, Site Engineering determined that Primary Containment Isolation System (PCIS) contacts for Reactor Building Ventilation (VR) and Fuel Pool Cooling (FC) exhaust ventilation high radiation monitoring trip systems were not being tested in accordance with Technical Specification 4.3.2.2, "Isolation Actuation Instrumentation, Logic System Functional Tests", requirements. The relay contacts are internal to the radiation monitoring trip units. The relays function to initiate an automatic isolation of secondary containment and the automatic start of the Standby Gas Treatment System (SBGT).

Testing of the Reactor Building Ventilation and Fuel Pool Cooling exhaust ventilation radiation monitoring trip relay contacts was completed under special test procedure LLP-95-100, "VR and FC Radiation Monitoring Logic Test" at 07:16 on October 11, 1995. All relay contacts were verified to operate as required.

The root cause of this event is attributable to procedural and testing deficiencies.

APPROVED BY OMB NO. 3150-0104 U.S. NUCLEAR REGULATORY COMMISSION **EXPIRES 5/31/95** ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRC. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO LICENSEE EVENT REPORT (LER) THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503. TEXT CONTINUATION FACILITY NAME (1) DOCKET NUMBER (2) LER NUMBER (6) PAGE (3) YEAR SEQUENTIAL REVISION NUMBER 017 05000373 NUMBER LaSalle County Station Unit 2 OF 4

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

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor

Energy Industry Identification System (EIIS) codes are identified in the text as [XX].

A. CONDITION PRIOR TO EVENT

B. DESCRIPTION OF EVENT

At 1445 hours on October 10, 1995, Site Engineering determined that contacts of the Primary Containment Isolation System (PCIS){JM} for Reactor Building Ventilation (VR) and Fuel Pool Cooling (FC) exhaust ventilation high radiation monitoring trip systems were not being tested during system logic, functional, or calibration testing of the trip channels. The relay contacts are internal to the radiation monitoring trip units 1(2)D18-K609A/B/C/D and 1(2)D18-K615A/B/C/D. The relays function as the isolation trip channels for a VR and FC ventilation high radiation event. The contacts for the relays open upon de-energization of the relay coil when the trip set point of 10 mR/hr is exceeded, initiating an automatic isolation of secondary containment and automatic start of the Standby Gas Treatment System. The operation of the trip relay was verified during the functional and calibration surveillances by verification of alarm contacts of the same trip relay. The opening of the relay trip contact for the high radiation isolation trip function were not tested.

The determination of the VR and FC ventilation radiation monitor relay trip contacts not being tested was made as a result of a Site Engineering review of the Safety Related Contact Testing Adequacy (SRC1A) evaluation for LaSalle Station. The SRCTA was performed by NUS (an architect engineering firm). NUS had completed its review of the LaSalle Reactor Building Ventilation System and had reported its findings to the Station in a letter dated April 21, 1995. It wasn't until October 10, 1995, that Site Engineering determined the lack of testing of the relay contacts. The time lag, between the completion of the NUS review and Site Engineering's determination of the relay trip contacts not being tested, was due to the fact that this task was not assigned the high priority it deserved considering the potential adverse consequences of the failure to test these contacts. Upon the determination that the VR and FC ventilation radiation monitor relay trip contacts were not being tested in accordance with Technical Specification 4.3.2.2, "Isolation Actuation Instrumentation, Logic System Functional Tests", requirements, the Operations Department and the LaSalle Station NRC Resident Inspector were notified. A 24 hour time clock was entered under Tech Spec 4.0.3 to perform the Tech Spec surveillance requirement or thereafter to take the Tech Spec 3.3.2 action specified for the inoperable trip systems. The testing was completed under a special test procedure LLP-95-100, "VR and FC Radiation Monitoring Logic Test", within the 24 hour time clock. All relay contacts were verified to operate as required.

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This event is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B)

C. CAUSE OF EVENT

The cause of this event is attributed to procedural deficiencies. Neither the LaSalle Electrical Surveillances which test the secondary containment isolation system logic, nor the LaSalle Instrument Surveillances, which calibrate and functionally test the VR and FC radiation isolation trip channels verified that the high radiation trip relay contact opened to perform its trip function.

D. ASSESSMENT OF SAFETY CONSEQUENCES

The Reactor Building Ventilation radiation monitoring subsystem and Fuel Pool Cooling exhaust ventilation radiation monitoring subsystem provide the capability, upon detecting high radiation levels, to initiate the isolation of Reactor Building Ventilation and startup the Standby Gas Treatment System. During refueling operation, the monitoring system acts as an engineered safeguard against the consequences of a refueling accident and/or a rod drop accident.

The impact on safety of this event was minimal. Although the radiation monitoring relay trip contacts were not tested during the system logic testing, the special testing verified that the relay contacts would have fulfilled their safety related function. In addition, the instrument functional and calibration testing of the radiation monitoring channel verified the alarm function of these systems.

E. CORRECTIVE ACTIONS

Testing of the Reactor Building Ventilation and Fuel Pool Cooling exhaust ventilation radiation monitoring trip relay contacts was completed under special test procedure LLP-95-100, "VR and FC Radiation Monitoring Logic Test" at 07:16 October 11, 1995. All relay contacts were verified to operate as required.

Changes will be made to the surveillance procedures for logic testing of the Secondary containment isolation logic to include steps to verify that the Reactor Building Ventilation and Fuel Pool Cooling exhaust ventilation radiation monitoring trip relay contacts are functionally verified open during the testing. Revisions to address these changes to LES-PC-102A/B (LES-PC-202A/B), "Unit 1(2) Groups 2 and 4 Outboard/Inboard Isolation Actuation Logic System Functional Test", will be completed by the next Refueling Outage (L1RO7).

Site Engineering's review of the NUS Safety Related Contact Testing Adequacy (SRCTA) system evaluations, for Technical Specification related contacts, was completed November 1, 1995. This fulfills the commitments docketed in the letter dated May 19, 1995, "LaSalle Nuclear Power Station, Units 1 and 2 Supplemental Response to EDSFI Violation 373(374) 91019-07 Safety Related Contact Testing Assurance Program Request for Schedule Extension."

Site Engineering management has reviewed this event with the site engineering department to stress the importance and necessity of immediately addressing any safety related reviews. The adverse consequences that resulted from this event will be incorporated in the next quarterly training module for Engineering.

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F. PREVIOUS OCCURRENCES

LER NUMBER

TITLE

373-940012-00

Untested Contacts in the NR and RP System due to Procedure Deficiencies

G. COMPONENT FAILURE DATA

Since no component failure occurred, this section is not applicable.