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November 9, 1995 C321-95-2335

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

Dear Sir:

Subject:

Oyster Creek Nuclear Generating Station

Docket No. 50-219

Licensee Event Report 95-006

Enclosed is Licensee Event Report 95-006. This event did not impact the health and safety of the public.

If any additional information or assistance is required, please contact Mr. John Rogers of my staff at 609.971.4893.

John J. Barton

Vice President and Director

Oyster Creek

JJB/JJR Enclosure

cc: Oyster Creek NRC Project Manager Administrator, Region I

Senior Resident Inspector

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U.S. NUCLEAR REGULATORY COMMISSION NRC FORM 366 APPROVED BY OMB NO. 3150-0104 (4-95)**EXPIRES 04/30/98** 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-6 F33). U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON DC 20555-0001 AND TO THE PAPERWORK REDUCTION PROJECT (3750-0104). OFFICE OF MANAGEMENT AND BUDGET WASHINGTON, DC 20503 LICENSEE EVENT REPORT (LER) PAGE (2) DOCKET NUMBER (2) FACILITY NAME (1) 1 OF 3 05000 - 219 Oyster Creek Unit 1 TITLE (4) Inoperable Emergency Lighting Units Result in Operation not in Compliance with Technical Specifications OTHER FACILITIES INVOLVED (8) REPORT DATE (7) LER NUMBER (6) EVENT DATE (5) MONTH | DAY YEAR SEQUENTIAL REVISION DAY YEAR MONTH VEAR 05000 NUMBER NUMBER DOCKET NUMBER FACILITY NAME 00 95 006 10 95 05000 THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11) **OPERATING** X | 50.73(a)(2)(i) 50.73(a)(2)(viii) MODE (9) 20.2203(a)(2)(v) 20.2201(b) 50.73(a)(2)(x) 50.73(a)(2)(ii) 20.2203(a)(3)(i) 20.2203(a)(1) POWER 100 73.71 50.73(a)(2)(iii) 20.2203(a)(3)(ii) LEVEL (10) 20 2203(a)(2)(l) OTHER 50.73(a)(2)(iv) 20.2203(a)(4) 20.2203(a)(2)(ii) Specify in Abstract below or in NRC Form 366A 50.73(a)(2)(v) 50.36(c)(1) 20.2203(a)(2)(iii) 50.73(a)(2)(vii) 50.36(c)(2) 20.2203(a)(2)(iv) LICENSEE CONTACT FOR THIS LER (12) ELEPHONE NUMBER (Include Area Code) NAME 609.971.2264 Timothy Trettel COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13) REPORTABLE CAUSE REPORTABLE COMPONENT MANUFACTURER CAUSE SYSTEM TO NPRDS

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

(If yes, complete EXPECTED SUBMISSION DATE)

SUPPLEMENTAL REPORT EXPECTED (14)

During a review of routine monthly surveillance tests, five 10 CFR 50 Appendix R Emergency Lighting Units (ELU) were found to have been out of service for an extended period of time, between 51 to 114 days. These lights were required for either equipment illumination or access/egress functions.

XINO

EXPECTED

SUBMISSION

MONTH

YEAR

The cause of this excessive out of service time was the lack of procedural direction in the surveillance for the Appendix R required lights. The safety significance of this event is minimal as the combination of other ELUs throughout the plant, available portable lighting, and operator familiarity with the plant and equipment would have compensated for these five non-functional ELUs in the unlikely event that they would have been needed. All ELUs were quickly repaired when their Appendix R applicability was identified. To prevent a recurrence of this event, a Preventative Maintenance task was written to direct immediate repairs for inoperable ELUs when found. Additional guidance in reporting requirements and compensatory actions for non-functional Appendix-R required ELUs will be incorporated into the Preventative Maintenance task.

NRC FORM 366A (4-95)	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION	U.S. NUCLEAR REGULAT	ORY COMMISSION
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Oyster Creek, Unit 1	-219	95 006 00	2 of 3

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

## DATE OF DISCOVERY

On September 26, 1995, five of the Stations Emergency Lighting Units (ELU) (EIIS: FH) installed to satisfy Section III.J of Appendix R were found to be out of service for varying durations between June and October 1995.

## IDENTIFICATION OF OCCURRENCE

A Plant Review Group (PRG) meeting was held on Oct. 11, 1995 to review the significance of inoperable ELUs which were installed in accordance with 10 CFR Part 50, Appendix R, Section III.J. Oyster Creek Operating License in Section 2.D requires Oyster Creek to have a Fire Protection Program and addresses Appendix R concerns. It was determined that five ELUs were inoperable for an extended period of time without compensatory measures being taken. This event was determined to be reportable under 10 CFR 50.73(a)(2)(i).

# CONDITIONS PRIOR TO DISCOVERY

The plant has been operating at approximately 100% power since startup from our last refueling outage in the fall of 1994, which includes the period of this extended inoperability.

### DESCRIPTION OF OCCURRENCE

Plant maintenance personnel identified the failure of several ELUs while performing a monthly surveillance. A subsequent review of monthly surveillances revealed that five Appendix R lighting units were inoperable for an extended length of time. The times between discovery of the inoperable lights and the subsequent repair varied from 51 to 114 days. These lights were intended for either equipment illumination or access/egress functions.

# APPARENT CAUSE OF OCCURRENCE

The cause of the extended length of inoperability was an unclear station procedure. The testing of emergency lights had been controlled by station procedure 658.2.001 which required issuing of a deviation report for impairments and a subsequent maintenance work request. The repair of these lighting units had previously been scheduled by maintenance as fill-in work as resources were available. The surveillance did not identify the differences between the lighting units installed for compliance with Appendix R and those installed for other reasons. Therefore, the impaired ELUs did not receive the proper priority and no compensatory measures in the event of a failure were identified in the procedure.

#### U.S. NUCLEAR REGULATORY COMMISSION NRC FORM 366A LICENSEE EVENT REPORT (LER) TEXT CONTINUATION PAGE (3) DOCKET (2) LER NUMBER (6) FACILITY NAME (1) SEQUENTIAL NUMBER REV YEAR 05000 00 3 of 3 95 006 -219 Ovster Creek, Unit 1

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

# ANALYSIS OF OCCURRENCE AND SAFETY ASSESSMENT

10 CFR Part 50, Appendix R Section III.J EMERGENCY LIGHTING, requires lighting with a 8-hour battery supply be provided in areas needed for operation of safe shutdown equipment and in access and egress routes thereto. Five areas at Oyster Creek were without the required lighting for an extended period of time (up to 114 days).

During the time Appendix R ELUs were affected, illumination was available from other operating ELUs in various plant areas and portable lighting (flashlights) were available to both operators and fire brigade personnel. These other ELUs along with flashlights, employees familiarity with the site, buildings, and equipment would provide a proper response in the unlikely event of an emergency involving the need for the five inoperable ELUs. This event did not significantly affect nuclear safety or safe plant operations.

# CORRECTIVE ACTION

## Short Term

Upon identification and notification to Maintenance of the significance of the ELUs, the lights were repaired and returned to service by October 1, 1995. The surveillance procedure which inspects these lights was changed to a Preventative Maintenance (PM) task. This will provide for maintenance to perform immediate repairs during the performance of testing. This will significantly decrease the out of service times for these units

# Long Term

- 1. The new PM task will identify which ELUs are Appendix-R required
- 2. The new PM task will require a Deviation Report to be initiated upon failure of a unit to illuminate. This ensures proper attention and management visibility of this issue.
- 3. The new PM task will require an immediate notification to Operations when a failure is identified and specify which compensatory measures are to be taken.

## SIMILAR EVENTS

None.