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LWP-95-109

November 30, 1995

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

Reference: Quad Cities Nuclear Power Station
Docket Number 50-254, DPR-29, Unit One

Enclosed is Licensee Event Report (LER) 95-006, Revision 00, for Quad Cities Nuclear Power Station.

This report is submitted in accordance with the requirements of the Code of Federal Regulations, Title 10, Part 50.73(a)(2)(i)(B). The licensee shall report any operation or condition prohibited by the Plant's Technical Specifications.

The following commitments are being made by this letter:

Procedure QCOP 500-1 will be revised to add a step to verify that the Reactor Protection System (RPS) Electrical Protection Assemblies (EPA) surveillance is current prior to declaring the RPS EPAs operable. The next session of license requalification will include a discussion of this event. The discussion is to include surveillance testing requirements to be considered when determining if equipment is operable and what to consider before repositioning the Mode Switch.

If there are any questions or comments concerning this letter, please refer them to Nick Chrissotimos, Regulatory Assurance Administrator at 309-654-2241, ext. 3100.

Respectfully,

COMMONWEALTH EDISON COMPANY
QUAD CITIES NUCLEAR POWER STATION

L. W. Pearce
Station Manager

LWP/NC/plm

Enclosure

cc: J. Schrage
C. Miller
INPO Records Center
NRC Region III

9512070131 951130
PDR ADOCK 05000254
S PDR

Licensee Event Report Reviewer Assignment Form

Revised 12/01/94

LER # 254\95-006

Date: November 5, 1995

Subject: The Reactor Mode Switch Was Taken Out of Shutdown Prior to
Completing a Required Technical Specification Surveillance
Due to a Procedure Deficiency

Signatures of reviewers indicating review and approval of item:

Systems Eng. Supv:	<u>DyUBD for</u>	<u>11-17-95</u>	<u>/</u>	<u>Date</u>
		<u>Date</u>		
Operating Eng.:	<u>Alex L. Misch</u>	<u>11/21/95</u>	<u>/</u>	<u>Date</u>
		<u>Date</u>		
	<u>J. Menemann</u>	<u>11/17/95</u>	<u>/</u>	<u>Date</u>
		<u>Date</u>		
	<u>James Dine</u>	<u>11/17/95</u>	<u>/</u>	<u>Date</u>
		<u>Date</u>		

Approved:

*MR for
PORC corrections 11-30-95*

[Signature]
Station Manager/PORC Chairman

12/1/95
Date

LICENSEE EVENT REPORT (LER)

Form Rev. 2.0

Facility Name (1) Quad Cities Unit One	Docket Number (2) 0 5 0 0 0 2 5 4	Page (3) 1 of 0 5
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Title (4)
Missed Technical Specification Surveillance Due To A Procedure Deficiency.

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)																			
1	1	0	3	9	5	9	5	--	0	0	6	--	0	0	1	1	3	0	9	5			0	5	0	0	0		

OPERATING MODE (9) 2	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)			
POWER LEVEL (10) 0 0 0	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> Other (Specify in Abstract below and in Text)
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)	
NAME Nick Chrissotimos, Regulatory Assurance, Ext. 3100	TELEPHONE NUMBER AREA CODE: 3 0 9 6 5 4 - 2 2 4 1

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
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO					

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

ABSTRACT:
On November 3, 1995, Unit One was in day 12 of a forced outage to address concerns with the Scram Discharge Volume level instrumentation. At 1930, the Reactor Mode Switch was taken out of SHUTDOWN Mode for prior to startup testing with the Reactor Protection System (RPS)[JC] Electrical Protection Assemblies (EPA)[RLY] having exceeded their Technical Specification surveillance interval.

The root cause of this missed surveillance was Ineffective Written Communications. Procedure QCOP 500-1 contained the prerequisite: There are two operable Reactor Protection System Electrical Protection Assemblies for each inservice RPS MG set or Inservice Alternate Power Supply. The prerequisite was unclear as it did not specifically explain the requirement that the functional test needed to be current prior to repositioning the Mode Switch from SHUTDOWN.

Procedure QCOP 500-1 will be enhanced to more accurately define RPS EPA operability. This missed Technical Specification surveillance will be discussed in the next session of license requalification. The discussion is to include surveillance testing requirements to be considered when determining if equipment is operable and what to consider before repositioning the Mode Switch.

This report is being submitted in accordance with 10 CFR 50.73(a)(2)(i)(B), which requires that within 30 days after the discovery of the event, the licensee shall report any operation or condition prohibited by the plant's Technical Specifications.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Form Rev. 2.0

FACILITY NAME (1) Quad Cities Unit One	DOCKET NUMBER (2) 0 5 0 0 0 2 5 4	LER NUMBER (6)						PAGE (3)		
		Year		Sequential Number			Revision Number			
		9 5	-	0 0	6	-	0 0	2	OF	0 5

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

PLANT AND SYSTEM IDENTIFICATION:

General Electric - Boiling Water Reactor - 2511 Mwt rated core thermal power.

EVENT IDENTIFICATION: The Reactor Mode Switch Was Taken Out Of Shutdown Prior To Completing A Required Technical Specification Surveillance Due To A Procedure Deficiency.

A. CONDITIONS PRIOR TO EVENT:

Unit: One Event Date: November 21, 1995 Event Time: 19:30
 Reactor Mode: 02 Mode Name: Refuel Power Level: 0

This report was initiated by Licensee Event Report LER 254\95-006.

REFUEL (2) - In this position interlocks are established so that one control rod only may be withdrawn when flux amplifiers are set at the proper sensitivity level and the refueling crane is not over the reactor. Also, the trip from the turbine control valves, turbine stop valves, main steam isolation valves, and condenser vacuum are bypassed. If the refueling crane is over the reactor, all rods must be fully inserted and none can be withdrawn.

B. DESCRIPTION OF EVENT:

On November 3, 1995, Unit One (U1) was in day 12 of a forced outage to address concerns with the Scram Discharge Volume (SDV) level instrumentation. At 1930, the U1 Unit Supervisor directed the Mode Switch be moved from SHUTDOWN to REFUEL to allow prior to startup testing and control rod exercising. The "A" Channel Reactor Protection System (RPS)[JC] Electrical Protection Assemblies (EPA)[RLY] had not been tested within the last six months and the unit was in cold shutdown for greater than 24 hours.

Technical Specification 4.9.F.1.a. states: The RPS EPAs shall be determined operable by performance of a channel functional test each time the plant is in cold shutdown for a period of more than 24 hours, unless performed in the previous 6 months.

The U1 RPS EPAs were last tested approximately 11 months before, on November 30, 1994, and the date was recorded on QOS 005-S16, "Operations Department Cold Shutdown Test Assignment Sheet".

On October 23, 1995, at 0920, 22 hours after reaching cold shutdown with the Reactor vented, reserve power RPS EPAs 1AB1 & 1AB2 functional testing was completed satisfactorily. Equipment problems delayed the functional testing of the remainder of the RPS EPAs until November 6, 1995.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Form Rev. 2.0

FACILITY NAME (1) Quad Cities Unit One	DOCKET NUMBER (2) 0 5 0 0 0 2 5 4	LER NUMBER (6)			PAGE (3) 3 OF 0 5
		Year	Sequential Number	Revision Number	
		9 5	- 0 0 6	- 0 0	

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

On November 3, 1995, at 1930, with 1B RPS on reserve power with the EPAs functionally tested and 1A RPS on normal power with the EPAs not yet tested, the U1 Unit Supervisor reviewed procedure QCOP 500-1, "Moving the Reactor Mode Switch out of the Shutdown Position" and directed that the Mode Switch be moved from SHUTDOWN to REFUEL. This was to allow prior to startup testing and control rod exercising. The Unit Supervisor stated that he was aware the RPS EPA surveillance was not complete and he believed it was the same as a cold shutdown Inservice Testing (IST) surveillance which needed to be completed prior to startup. He did not recognize that the RPS EPAs needed to be tested prior to repositioning the Mode Switch from SHUTDOWN.

On November 5, 1995, at 1402, the U1 Reactor Mode Switch was placed in SHUTDOWN due to the 1A1 and 1A2 RPS EPAs not having been tested within the last six months and the unit in cold S/D for greater than 24 hours.

C. APPARENT CAUSE OF EVENT:

This report is being submitted in accordance with 10 CFR 50.73(a)(2)(i)(B), which requires that within 30 days after the discovery of the event, the licensee shall report any operation or condition prohibited by the plant's Technical Specifications.

The root cause of this missed surveillance was Ineffective Written Communications. Procedure QCOP 500-1 contained the prerequisite: There are two operable Reactor Protection System Electrical Protection Assemblies for each inservice RPS MG set or Inservice Alternate Power Supply. The prerequisite was unclear as it did not specifically explain the requirement that the functional test needed to be current prior to repositioning the Mode Switch from SHUTDOWN.

D. SAFETY ANALYSIS OF EVENT:

The Safety significance of this event is minimal. On November 6, 1995, the 1A1 & 1A2 RPS EPAs were successfully tested. The 1A1 and 1A2 RPS EPAs are installed in series so that both assemblies would have to fail to prevent them from performing their intended function. The Unit Supervisor was aware that the functional test needed to be completed prior to Reactor Startup. With the Mode Switch in the REFUEL position, control rod withdrawal is restricted so that only one rod may be withdrawn from the core at any time. As part of beginning of cycle testing, shutdown margin and single rod criticality checks were completed. This assures that subcriticality will be maintained with any one control rod withdrawn from the core.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Form Rev. 2.0

FACILITY NAME (1) Quad Cities Unit One	DOCKET NUMBER (2) 0 5 0 0 0 2 5 4	LER NUMBER (6)			PAGE (3) 4 OF 0 5
		Year	Sequential Number	Revision Number	
		9 5	- 0 0 6	- 0 0	

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

E. CORRECTIVE ACTIONS:

Corrective Actions Completed:

On November 5, 1995, at 1402, the U1 Reactor Mode Switch was placed in SHUTDOWN. At 1010 on November 6, 1995, the U1 Reactor Mode Switch was taken Out of Service in the SHUTDOWN mode because the RPS EPAs were inoperable. The U1 RPS EPA Functional test was later successfully completed on November 6, 1995.

Corrective Action to be Completed:

A Procedure Change request will be submitted to enhance QCOP 500-1 to include the following requirement to more accurately define RPS EPA operability:

C.3 IF the Reactor is in Cold Shutdown for greater than 24 hours, AND RPS EPA functional testing has not been performed in the previous 6 months, THEN perform QCOADS 100-4, "Cold Shutdown Functional Test Reactor Protection System Electrical Protection Assemblies" to demonstrate operability before moving the Mode Switch out of Shutdown.

Verification of RPS EPA operability will also be added to Attachment A of this procedure. This procedure change will be completed by February 1, 1996.
(NTS # 2541809500601)

Training Request # 95-1800 has been submitted to include in the next session of license requalification a discussion of this missed Technical Specification surveillance. The discussion is to include surveillance testing requirements to be considered when determining if equipment is operable and what to consider before repositioning the Mode Switch. This training will be completed by February 26, 1996.
(NTS # 2541809500602)

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Form Rev. 2.0

FACILITY NAME (1) Quad Cities Unit One	DOCKET NUMBER (2) 0 5 0 0 0 2 5 4	LER NUMBER (6)			PAGE (3) 5 OF 0 5
		Year	Sequential Number	Revision Number	
		9 5	- 0 0 6	- 0 0	

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

F. PREVIOUS EVENTS:

A review of OPEX reports of missed Technical Specification surveillances revealed no similar events. A review of previous Licensee Event Reports (LER) at Quad Cities Station Units One and Two, since January 1, 1990 concerning a Technical Specification surveillance not being completed within the required time due to inadequate procedures, revealed the five previous events listed below.

- LER 1-92-009 Missed Technical Specification functional test requirements due to an inadequate procedure which did not test the indication of a downscale failure.
- LER 1-92-011 A Recirculation Loop temperature not recorded due to inoperable recorder and procedural inadequacy because it did not indicate when the computer point was available.
- LER 1-94-003 Continuous firewatch not established following impairment of a Safe Shutdown path due to lack of training, poor verbal and written communications, and change management. Guidance for the establishment of compensatory measures was contained in several procedures as opposed to being consolidated in one instruction.
- LER 2-90-002 Missed Technical Specification Fire Valve Surveillance, valve not cycled due to procedure inadequacy. The procedure did not clearly require certain High Radiation area fire valves be inspected.
- LER 2-92-006 Missed On-site review of temporary procedure due to procedure deficiency. The procedure for making temporary changes to procedures was vague in describing the use of the closeout tracking form.

This is the only Technical Specification requirement specifically identified with a 24 hour cold shutdown time interval.

G. COMPONENT FAILURE DATA:

There is no component failure associated with this event.