#### **BOSTON EDISON**

Pilgrim Nuclear Power Station Rocky Hill Road Plymouth, Massachusetts 02360

Roy A. Anderson Senior Vice President - Nuclear

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May 4, 1992 BECo Ltr. 92-55

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

> Docket No. 50-293 License No. DPR-35

The inclosed Licensee Event Report 1) 92-005-00, "Unplanned Actuation of a Portion of Core Cooling Systems Logic Circuitry During Testing Khile Shutdown", is submitted in accordance with CFR Part 50.73.

Please do not hesitate to contact me if there are any questions regarding this report.

ETBoulitte

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R. A. Anderson

DWE/bal

Enclosure: LER \$2-005-00

cc: Mr. Thomas T. Martin Regional Administrator, Region I U.S. Nuclear Regulatory Commission 475 Allendale Rd. King of Prussia, PA 19406

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Sr. NRC Resident Inspector - Pilgrim Station

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U.S. NUCLEAR REGULATORY COMMISSION

APPROVED DMB NO. 3150-0104 EXPIRES 4/30/51

# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WTH THIS INFORMATION COLLECTION REQUEST 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BPANCH IP.500 US NUCLEAR REGULATORY COMMISSION WASHINGTON, DC 20555 AND TO THE PARPERWORK REDUCTION PROJECT (3150-0104) OFFICE OF MANAGEMENT AND BUDGET WASHINGTON, DC 20503

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# BACKGROUND

NRC FORM 386A

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The Reactor Vessel (RV) in trumentation includes RV water level, RV coolant flow rates and differential pressure, and RV internal pressure. The Drywell instrumentation includes Drywell pressure. By design, this safety-related instrumentation is arranged into separate, redundant Channels 'A' and 'B'. Each instrument channel is connected to piping extending into primary containment. The Analog Trip System (ATS) is part of the instrumentation monitoring RV and Drywell parameters. The ATS consists of transmitters, master trip units, slave trip units, and trip relays. The transmitters are housed on instrument racks located outside primary containment. The transmitters convert the parameter being monitored into signals. The signals are converted into indications and/or trip functions to related systems. The systems include the Reactor Protection System (RPS), Anticipated Transient Without Scram (ATWS) System, Primary Containment Isolation Control System (PCIS)/Reactor Building Isolation Control System (RBIS), Core Standby Cooling Systems (CSCS), and Reactor Core Isolation Cooling (RCIC) System.

The ATS cabinets contain the master trip units, slave trip units, trip relays, and power supplies. Typically, each transmitter provides signals to a master trip unit. The signal is proportional to the parameter boing monitored. The master trip unit converts the signals into an indication and/or trip function. Slave trip units provide functions similar to the master trip units. Slave trip units receive signals from the transmitter via the related master trip unit. The setpoints of the master trip units and slave trip units are individually calibrated. If the signal reaches the setpoint, the trip unit energizes a normally de-energized trip relay connected to the related system. If a master trip unit is removed while the slave trip units are installed, the related slave trip units having a low level or low pressure function will cause the associated trip relay to become energized; moreover, the related slave trip units having a high level or high pressure function will not allow the associated trip relay to become energized.

Just prior to the event, the status of plant systems were:

- The Emergency Diesel Generators (EDGs) 'A' and 'B' were in standby service. The Auxiliary Power Distribution System was energized from the preferred offsite transmission system via the Startup Transformer. The switchyard air circuit breakers ACBs 102, 103, 104, and 105 were closed. The 23 KV distribution system was energized. The shutdown transformer was in standby service.
- The Recirculation System was not in service. The Loop 'A' and 'B' suction and discharge valves were closed.
- The Feedwater System pumps were not in service.
- The RPS manual scram channels A3 and B3 were in the tripped condition.
- The Reactor Vessel (RV) water level was steady at approximately +30 inches.

NRC FORM 366A (6-89)	U.S	NUCLEAR REGULATORY COMMISSION	APPROVED DM8 NO 3150-0104 EXPIRES 4 30/92							
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The Residual Heat Removal (RHR) System Loop 'B' was in the shutdown cooling (SDC) mode. The Loop 'B' pumps P 203B/D were in service with valve MO-1001-28B in a throttled position and with valve MO-1001-29B in the open position. The Loop 'B' heat exchanger bypass valve MO-1001-16B was open. The Loop 'A' pumps were in standby service with valve MO-1001-28A in a throttled position and MO-1001-29A in the closed position. The Loop 'A' heat exchanger bypass valve MO-1001-16A was closed.

## EVENT DESCRIPTION

On April 3, 1992 at 0327 hours, an unplanned actuation of a portion of the Core Standby Cooling System (CSCS) logic circuitry occurred while shut down. The actuation resulted in the following observed responses:

- Automatic start of EDGs 'A' and 'B'. The EDGs did not load onto the respective 4160 VAC bus because the buses remained energized.
- Automatic start of the RHR System Loop 'A' pumps P-203A/C and automatic repositioning of the RHR Loop 'B' valve MO-1001-28B from a throttled position to the full open position. The RHR Loop 'B' valve MO-1001-29B remained in the fully open position. The RHR Loop 'A' valve MO-1001-28A closed and the heat exchanger bypass valve MO-1001-16A opene
- Automatic opening of the High Pressure Co. Injection (HPCI) System turbine steam supply valve MO-2301-3 and automatic ing of the HPCI injection valve MO-2301-8. The HPCI System did not start because the steam supply pressure was less than the low pressure isolation setpoint.

The event occurred during the performance of temporary procedure TP 92-020 (Rev. 0), "Reactor Level Instrument Line Test & Investigation on Rack 2206 (Constant Level, Decreasing Pressure) at step 10.2[2](c). For this step, the ATS master trip unit LIS-263-72D was removed from its installed location in the analog trip cabinet C2233B. Master trip unit LIS-263-72B had been removed from its installed location at step 10.2[2](a). With the plant conditions existing at the time of the event, the concurrent low-low reactor water level trip signals from slave trip units LS-263-72B-1 and LS-263-72D-1 satisfied a portion of the Channel 'B' logic circuitry and resulted in the event.

The performance of TP 92-020 was terminated, the master t-'p units were reinstalled, the affected circuitry was reset, and the affected systems and components were restored to conditions existing prior to the event. Problem Report 92-9011 was written to document the event. The NRC Operations Center was notified in accordance with 10 CFR 50.72 on April 3, 1992 at 0423 hours.

This event occurred with the reactor mode selector switch in the SHUTDOWN position. The control rods were in the inserted position. The Reactor Vessel (RV) pressure was zero psig with the head vent valves open. The RV water temperature was upproximately 137 degrees Fahrenheit. No activity was being performed having the potential to drain the RV. The test was being performed as part of investigating an event reported in Licensee Event Report 50-293/92-004-00.

NRC FORM 366A U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO 3150 0104 EXPIRES 4/30/92 ESTIMATED BURDEN FER RESPONSE 10 COMP. Y WTH THIS INFORMATION COLLECTION REQUEST 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F.S.D. U.S. NUCLEAR REGULATOR'S COMMISSION WASHINGTON DC 20565 AND TO THE PARFEWORK REDUCTION PROJECT DISG 01041 OFFICE OF MANAGEMENT AND BUDGET WASHINGTON DC 20503 LICENSEE EVENT REPORT (LER) TEXT CONTINUATION FACILITY NAME (1) DOCKET NUMBER (2) LEA NUMBER (6 PAGE (3) NUMBER 005-010014 OF 017 Pilgrim Nuclear Power Station 0 5 0 0 0 2 9 3 9 2

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### CAUSE

The root cause of the event was a procedure deficiency due to utility non-licensed personnel error in that procedure TP 92-020 did not contain sufficient precautions or steps to preclude the actuation. The actuation was the designed response to the conditions existing at the time of the event and the removal of the master trip units while the slave trip units (e.g. LS-263-72B-1 and 72D-1) were installed.

The procedure was developed consistent with the guidance of procedure 1.3.4-1.9 (Rev. 2), "Temporary and Special Test Procedures Formatting Guide". Procedure TP 92-020 was written by an assigned individual having an Instrumentation and Control (I&C) background. Procedure TP 92-020 was generally consistent with the guidance of procedure 1.3.4-4 (Rev. 3), "Procedure Technical Review and Validation", for procedure writing, technical review, and validation. However, procedure TP 92-020 did not contain sufficient precautions or steps to preclude the actuation. During the development of TP 92-020, the procedure writer focused on possible adverse impact to plant safety and operation. The procedure writer understood the functions of the ATS master trip units, slave trip units, power supplies, and normally de-energized/energize-to-trip relays. Because of the focus on plant safety and operation, the procedure writer thought the removal of only the master trip units was sufficient for the test.

The technical review criteria of procedure 1.3.4-4 includes provision for appropriate cautions warning of conditions which can cause or increase the probability of an engineered safety feature actuation. The technical reviewer was qualified to perform the technical review and understood the purpose for procedure TP 92-020. The technical reviewer also understood the electrical isolations for TP 92-020 included the removal of the applicable master and slave trip units, with the removal of the applicable slave trip units first followed by the related master trip unit. Procedure TP 92-020, section 10.2, contained master trip units only. The technical reviewer thought the related slave trip units were included because of previous discussions with the other personnel responsible for the procedure. The ATS transmitters and functions provided by the related master and slave trip units were identified in the discussion section of TP 92-020.

The validation criteria of procedure 1.3.4-4 includes the identification of interactions with other systems and equipment. The procedure validator was qualified to perform the validator of the validator had reviewed a previous draft of TP 92-020 and was aware some precise were not specified in the procedure to preclude an actuation of the R<sup>r</sup> PCIS, RBIS, and CSCS logic circuitry. After the jumpers were specified in the procedure, the validator reviewed TP 92-020 and related drawings of the ATS, RPS, PCIS, RBIS, CSCS and RCIC circuitry. The validator review focused on the jumpers relative to the RPS, PCIS, and RBIS and on the master trip units. The validator could not recall why the slave trip units were not considered during the validation. After validating TP 92-020, the validator attended the Operations Review Committee meeting for TP 92-020 and answered questions including those regarding jumpers to preclude an unplanned actuation during the performance of IP 92-020.

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 2180-0104 EXE/RES. 4/30/92

# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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NRC FORM PSEA

After the event, a review of TP 92-020 revealed the procedure was issued without approval signature by the Plant Manager contrary to procedure 1.3.4 (Rev. 44) section 5.3.16, "Procedure Approval and Distribution". Problem Report 92-1013 was written to document the discovery. Procedure TP 92-020 was reviewed by the Operations Review Committee on April 2, 1992 during a meeting held after normal working hours. The committee recommended approval of TP 92-020 by the Plant Manager.

Procedure 1.3.4, section 5.3.16, contains controls for issuing a procedure after normal working hours. The controls include obtaining department manager approval signature prior to procedure issuance. However, the individual who was given the procedure package after ORC reviee as told by the first individual to "hot issue" the procedure. The second individ was the relief for the first individual. The shift turnover also included other verbal communications. The second individual verified the procedure was in the package. The package contained the appropriate 10 CFR 50.59 checklists, safety evaluation, procedure forms, and TP 92-020. However, the procedure cover page signature block was obscured by the form used when a procedure is revised or issued as a new procedure. Moreover, the individual was not told the Plant Manager signature block was not signed and was not told ne was responsible for obtaining the signature. Consequently, the procedure package was delivered to the Document Control Center (DCC) for issuance.

The procedure package was checked by the shift DCC individual for the appropriate checklists, safety evaluation, and procedure forms with satisfactory results. The procedure was also checked for format and legibility with satisfactory results. These actions by the DCC individual were in accordance with Pilgrim DCC work instruction 2.24 (Rev. 11), "Control of PNPS Operations Manual Procedures and Instructions", section 7.0 (procedure hot issue).

#### CORRECTIVE ACTION

Procedure TP 92-020 (Rev. 0) was retired and replaced by procedure TP 92-022 (Rev. 0). Procedure TP 92-022 contained additional steps for removing and reinstalling the master trip units and slave trip units including the order the trip units were to be removed and reinstalled. Procedure TP 92-022 was approved in accordance with procedure 1.3.4 and issued on April 5, 1992. The performance of TP 92-022 began on April 5, 1992 at 400 hours and was completed on April 7, 1992 at 0342 hours.

Pilgrim Station DCC personnel were briefed on April 3, 1992 regarding the issuance of TP 92-0 without approval signature. The Pilgrim DCC work instruction 2.24 (Rev. 11) 'Control of PNPS Operations Manual Procedures and Instructions", will be reviewed for possible improvement.

A review was conducted of other procedures 'hot issued' during the outage. The review revealed the procedures were approved in accordance with procedure 1.3.4.

The personnel responsible for 1P92-020 and 'hot issue' of TP 92-020 were counselled.

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#### SAFETY CONSEQUENCES

This event posed no threat to the public health and safety.

The actuation was the designed response to the conditions existing at the time master trip units LIS-263-72B and LIS-263-72D were removed from their installed locations.

There were no component or system failures associated with this event.

This report is submitted in accordance with 10 CFR 50.73(a)(2)(i)(B) because the issuance of procedure TP 92-020 without approval signature was contrary to the administrative controls specified by Technical Specification 6.3.B.

This report is also submitted in accordance with 10 CFR 50.73(a)(2)(iv) because the activation, although a designed response, was not an expected or planned part of procedure TP 92-020.

#### SIMILARITY TO PREVIOUS EVENTS

A review was conducted of Pilgrim Station Licensee Event Reports (LERs) submitted since January 1984. The review focused on LERs involving an unplanned actuation due to a procedural deficiency. The review identified a similar cause reported in LER 50-293/88-019-00.

For LER 88-019-00, an unplanned RPS scram signal occurred while shut down on July 8, 1988 at 1454 hours. The scram signal occurred 3 ring ATWS System Division 2 testing per procedure TP 87-126 (Rev. 5). The test began by simulating a low-low RV water level condition. The response resulted in the expected trips for the recirculation pump trip (RPT) and alternate rod insertion (ARI) functions. The ARI function further resulted in the designed slow depressurization of the scram air header and subsequent draining of control rod drive water into the scram discharge volume (SDV). When the water level in the SDV reached the level corresponding to 39 gallons, the unplanned scram signal occurred. The root cause of the event was inadequate review of TP 87-126 in that the review did not identify that a scram signal would occur as a result of the test.

NRC FORM 386A (5-89)		U.S. NUCLEAR REGULATORY COMMISSION	×	APPROVED OME NO. 5150-0104 EXPIRES 4/30-02												
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CODES

# ENERGY INDUSTRY IDENTIFICATION SYSTEM (EIIS) CODES

The EIIS codes for this report are as follows:

# COMPONENTS

Relay, tripping	94
Switch, indicating, level (LIS)	LIS
Valve (MO-202-5A/8)	V
Valve, control, temperature (MO-1001-16A/8)	TCV
Valve, injection (MO-1001-28A/8, -29A/8, MO-2301-8)	INV
Valve, shutoff (MO-2301-3)	SHV
SYSTEMS	
Emergency Onsite Power Supply System (EDGs)	EK
Engineered Safety Features Actuation System	JE
High Pressure Coolant Injection (HPCI) System	BJ
Reactor Recirculation System	AD
Residual Heat Removal System (RHR/LPCI)	BP
Solid State Control System (ATS)	JG