

VIRGINIA ELECTRIC AND POWER COMPANY NORTH ANNA POWER STATION P. O. BOX 402 MINERAL, VIRGINIA 23117

10 CFR 50.73

May 13,1992

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555 Serial No. N-92-19 NAPS:WCH Docket Nos. 50-339 License Nos. NPF-7

Dear Sirs:

The Virginia Electric and Power Company hereby submits the following Licensee Event Report applicable to North Anna Unit 2.

Report No. 50-339/92-011-00

This Report has been reviewed by the Station Nuclear Safety and Operating Committee and will be forwarded to the Corporate Management Safety Review Committee for its review.

Very Truly Yours,

Kane

Station Manager

Enclosure:

ec: U.S. Nuclear Regulatory Commission 101 Marietta Street, N.W. Suite 2900 Atlanta, Georgia 30323

> Mr. M. S. Lesser NRC Senior Resident Inspector North Anna Power Station

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# 1.0 Description of the Event

On April 20, 1992, at 2338 hours, Unit 2 was in Mode 4 and heating up to 340°F when the "C" Steam Generator (S/G) Level Channel II indication (EIIS System Identifier SB, Component Identifier SG-LI) began acting erratically and was placed in trip. At 0320 hours on April 21, 1992, the Reactor Coolant System (RCS) (EIIS System Identifier AB) temperature was increased to 350°F, thus entering Mode 3. Technical Specification (TS) Table 3.3-3 Item 6.c does not allow a mode change from Mode 4 to Mode 3 with one S/G level channel in trip: therefore, this event is reportable pursuant to 10CFR50.73(a)(2)(i)(B). Meanwhile, the Instrumentation Department had been performing troubleshooting operations on the power supply card (EIIS-RJX) for the subject channel, and they reported that the card was operating as designed. It was susported that source of the level fluctuation was at the transmitter (EIIS-LT) or in the sensing lines inside the containment building. At 0345 the Shift Supervisor directed that the level channel be taken out of trip because he felt having the channel in trip presented an increased risk of an inadvertent generation of a spurious Reactor Protection System (RPS) signal or Engineered Safety Feature (ESF) (EIIS System Identifier JE) actuation. It was subsequently determined that the level channel should have remained in trip, and actions were initiated to return the channel to the tripped condition. At 0445, TS 3.0.3 was entered because the level channel was still in service, and the one hour time limit of TS Table 3.3-3 Action 14 had expired. At 0448 the channel was placed back in trip. Since the one hour time limit expired while the channel was being placed in trip, this is also reportable pursuant to 10CFR50.73(a)(2)(1)(B).

#### 2.0 Significant Safety Consequences and Implications

No significant safety nonsequences resulted from this event because the two other level channels on "C" S/G were fully operable and the actual S/G level remained within the normal operating band. Therefore, the health and safety of the public were not affected at any time during this event.

### 3.0 Cause of the Event

The cause of the event was personnel error due to failure to consult all of the applicable TS.

TS Table 3.3-1 "Reactor Trip System Instrumentation," Item 14, "S/G Water Level Low-Low," specifies that 3 of 3 channels must be operable in Modes 1 and 2, but operational modes can be entered with one channel in trip with reliance on the provisions contained in the Action requirements. Based on this specification, the Shift Supervisor made the decision to change from Mode 4 to Mode 3 with one channel in trip, and subsequently take the channel out of trip. The error in this decision was to rely on one specification without reviewing all potential specifications which place requirements on this channel.

Unit 2 TS Table 3.3-3 Item 5.a, "Turbine Trip and Feedwater Isolation," specifies that 3 of 3 S/G water High-High level channels must be operable in

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# 3.0 Cause of the Event (continued)

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Modes 1.2 and 3, but operational modes can be entered with one channel in trip with reliance on provisions contained in the Action requirements. Item 6.c, "S/G Water Level Low-Low," requires the same number of operable channels, but operational modes cannot be entered unless the Limiting Conditions for Operation are met. In addition, the channel should have remained in trip until corrective actions were complete once it was placed in trip.

## 4.0 Immediate Corrective Actions

When the Operations Department determined that the channel should have remained in trip, actions were initiated to return the channel to the tripped condition. At 0445 hours, the level channel was still in service and the one hour time limit of TS Table 3.3-3 Action 14 had expired. Subsequently, TS 3.0.3 was entered. The channel was placed back in trip at 0448 hours.

### 5.0 Additional Corrective Actions

The Instrument Department later determined that the channel was operating properly and accurately after the sensing lines were blown down. The fluctur experienced earlier were caused by pressure changes and air in the second s

Operation. epartment personnel involved were disciplined by management regarding the policy of strict compliance with TS at all times. This discussion emphasized that the channel should have been fixed prior to taking it out of the trip condition.

#### 6.0 Actions to Prevent Recurrence

The swent will be discussed in the Licensed Operator Regualification Frogram.

A TS change package will be submitted to make the Unit 2 TS similar to Unit 1, since the Unit 1 TS allows a mode change with one SG level channel in trip. This will correct this obvious Unit 2 TS error.

# 7.0 Similar Events

LER 50-339/87-015-01 documents a Unit 2 shutdown required by TS on November 4, 1987, when "A" S/G Flow Channel III and "B" S/G Flow Channel IV were declared inoperable. The channels were not placed in trip within 1 hour of the first indication of potential inoperability.

LER 50-339/87-017-00 documents failure to place a nuclear instrument detector channel in trip within 1 hour after entering Mode 2.

### 8.0 Additional Information

North Anna Unit 1 was in mode 1 throughout this event and was not affected.