



Log # TXX-96032
File # 10200
Ref. # 10CFR50.73(a)(2)(1)

C. Lance Terry
Group Vice President

January 29, 1996

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)-UNIT 2
DOCKET NOS. 50-446
CONDITIONS PROHIBITED BY TECHNICAL SPECIFICATIONS
LICENSEE EVENT REPORT 446/96-001-00

- REF: 1) TU Electric letter logged TXX-96009 from C. L. Terry to the NRC dated January 4, 1996
- 2) TU Electric Letter logged TXX-96010 from Mr. C. L. Terry to the NRC dated January 5, 1996 requesting enforcement discretion for wide range RCS temperature-T_h remote shutdown indication for one RCS loop
- 3) NRC letter dated January 11, 1996 from Mr. W. D. Beckner to Mr. C. L. Terry granting enforcement discretion (NOED No. 96-6-001)
- 4) NRC Inspection Manual, Part 9900, "Operations - Enforcement Discretion," dated November 2, 1995

Gentlemen:

Enclosed is Licensee Event Report (LER) 96-001-00 for Comanche Peak Steam Electric Station Unit 2, "Allowed Outage Time Exceeded in Conjunction With Enforcement Discretion For The Reactor Coolant System Instrument Channel."

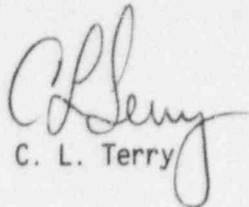
Via Reference 1 and Reference 2, TU Electric requested enforcement discretion not to enforce the shutdown requirement following the 7 day Allowed Outage Time (AOT) for the failed Wide Range RCS Temp.-T_h Remote Shutdown Indication instrument channel for RCS Loop 1. The enforcement discretion was granted via reference 3.

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The subject Licensee Event Report is being submitted to satisfy the requirements of 10CFR50.73(a)(2)(i)(B) and Reference 4, because the time requirements for the action statement were not met (see Reference 1 and Reference 2).

Sincerely,



C. L. Terry

OB:ob
Enclosures

cc: Mr. L. J. Callan, Region IV
Mr. W. D. Johnson, Region IV
Resident Inspectors, CPSES

NRC FORM 362 (4-95)		U.S. NUCLEAR REGULATORY COMMISSION			APPROVED BY OMB NO. 3150-0104 EXPIRES 4/30/98																																																						
<p>LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)</p>										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 P33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC. 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC. 20503.																																																	
Facility Name (1)							Docket Number (2)			Page (3)																																																	
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 2							05000446			1 OF 6																																																	
Title (4) ALLOWED OUTAGE TIME EXCEEDED IN CONJUNCTION WITH ENFORCEMENT DISCRETION FOR THE REACTOR COOLANT SYSTEM INSTRUMENT CHANNEL																																																											
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 Name		Docket Numbers																																																
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Operating Mode (9) 1												This report is submitted pursuant to the requirements of 10 CFR 5. (Check one or more) (11)																																															
Power Level (10) 100												<input checked="" type="checkbox"/> 20.2201 (b) <input type="checkbox"/> 20.2203 (a) (2) (v) <input checked="" type="checkbox"/> 50.73 (a) (2) (i) <input type="checkbox"/> 50.73 (a) (2) (viii) <input type="checkbox"/> 20.2203 (a) (1) <input type="checkbox"/> 20.2203 (a) (3) (i) <input type="checkbox"/> 50.73 (a) (2) (ii) <input type="checkbox"/> 50.73 (a) (2) (x) <input type="checkbox"/> 20.2203 (a) (2) (i) <input type="checkbox"/> 20.2203 (a) (3) (ii) <input type="checkbox"/> 50.73 (a) (2) (iii) <input type="checkbox"/> 73.71 <input type="checkbox"/> 20.2203 (a) (2) (ii) <input type="checkbox"/> 20.2203 (a) (4) <input type="checkbox"/> 50.73 (a) (2) (iv) <input type="checkbox"/> OTHER <input type="checkbox"/> 20.2203 (a) (2) (iii) <input type="checkbox"/> 50.36 (c) (1) <input type="checkbox"/> 50.73 (a) (2) (v) <input type="checkbox"/> Specify in Abstract below <input type="checkbox"/> 20.2203 (a) (2) (iv) <input type="checkbox"/> 50.36 (c) (2) <input type="checkbox"/> 50.73 (a) (2) (vii) <input type="checkbox"/> or in NRC Form 366A																																															
Name												Licensee Contact For This LER (12)																																															
David Kross - Shift Operations Manager												Telephone Number (Include Area Code) (817)897-8603																																															
Cause												System												Component												Manufacturer												Reportable To NPRDS											
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Supplemental Report Expected (14)												YES (If yes, completed EXPECTED SUBMISSION DATE) X NO												EXPECTED SUBMISSION DATE (15)																																			
ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)												On December 31, 1995, at approximately 2:10 a.m. the Wide Range Reactor Coolant System (RCS) Temp.-T _n for one RCS Loop was discovered to be inoperable. Troubleshooting efforts indicated a ground. Location of the ground was isolated to an area inside containment that is normally only accessible during periods of a reactor shutdown. Radiation levels, temperature and personnel safety considerations preclude further trouble shooting and corrective actions without performing a plant shutdown and a possible cooldown. The subject Licensee Event Report is being submitted to satisfy the requirements of 10CFR50.73(a)(2)(i)(B), because the time requirements for the action statement were not met. TU Electric requested enforcement discretion not to enforce the shutdown requirement following the 7 day Allowed Outage Time (AOT) for the failed Wide Range RCS Temp.-T _n Remote Shutdown Indication instrument channel for RCS Loop 1. The enforcement discretion was granted. CPSES Unit 2 has no other outages planned during the 7 weeks prior to the scheduled start of the refueling outage on February 22, 1996.																																															

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I. DESCRIPTION OF THE REPORTABLE EVENT

A. REPORTABLE EVENT CLASSIFICATION

Any operation or condition prohibited by the plant's Technical Specifications.

B. PLANT OPERATING CONDITIONS PRIOR TO THE EVENT

On January 7, 1996, Comanche Peak Steam Electric Station (CPSES) Unit 2 was in Mode 1, Power Operation, and operating at 100 percent power.

C. STATUS OF STRUCTURES, SYSTEMS, OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

The Wide Range RCS Temperature- T_h Remote Shutdown Indication for 1 of 4 RCS loops was inoperable and contributed to the event.

D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES

On December 31, 1995, at approximately 2:10 a.m. the Wide Range RCS Temp. T_h for one RCS Loop was discovered to be inoperable. Troubleshooting efforts indicated a ground. Location of the ground has been isolated to an area inside containment that is normally only accessible during periods of a reactor shutdown. Radiation levels, temperature and personnel safety considerations preclude further trouble shooting and corrective actions without performing a plant shutdown and a possible cooldown.

CPSES Unit 2 is scheduled to commence a refueling outage on February 22, 1996. CPSES Unit 2 has no other outages planned during the 7 weeks prior to the scheduled start of the refueling outage.

On January 5, 1996 at approximately 3:00 p.m. (CDT) during a teleconference with the NRC, TU Electric requested was granted a Notice of Enforcement Discretion (NOED). The NOED was requested to allow CPSES Unit 2 to continue to operate with the normal Wide Range RCS

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(Reactor Coolant System) Temp. (Temperature) - T_h Remote Shutdown Indication for 1 of 4 loops inoperable. An exigent change to the Technical Specifications to temporarily remove the requirement for the inoperable T_h instrument was submitted on January 5, 1996. Without the requested enforcement discretion and the requested Technical Specification change, compliance with CPSES Technical Specification 3.3.3.2.1 would require that TU Electric initiate unnecessary mode changes without a corresponding safety benefit, thus resulting in an unnecessary plant transient and unnecessary system realignments.

E. THE METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE OR PROCEDURAL ERROR

The Inoperability of the T_h instrument was discovered during a routine surveillance.

TU Electric management recognized that the additional time required to allow Unit 2 to operate until the scheduled refueling outage would exceed the required action statement.

II. ANALYSIS OF THE EVENT

A. SAFETY SYSTEM RESPONSES THAT OCCURRED

Not applicable- No Safety System responses occurred. The subject Licensee Event Report is being submitted to satisfy the requirements of 10CFR50.73(a)(2)(i)(B) and NRC Inspection Manual Part 9900 "10 CFR Guidance", because the time requirements for the action statement were not met.

B. DURATION OF SAFETY SYSTEM TRAIN INOPERABILITY

Not Applicable- No safety system trains were inoperable during this event.

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C. SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT

The subject instrument is part of the CPSES design for shutdown from outside the control room (see CPSES Final Safety Analysis Report (FSAR) section 7.4.1.3). The Hot Shutdown Panel (HSP) and the Shutdown Transfer Panel (STP) are provided as part of the CPSES unit design for shutdown outside the control room. Wide Range RCS Temperature indications are provided on the HSP for the RCS Loops. RCS temperature is used for monitoring the cooldown of the RCS and for the switch-over to Residual Heat Removal (RHR). In the unlikely event that shutdown from outside the control room (during the duration of the enforcement discretion) is required, the inoperability of Wide Range Temp. T_h for a single RCS Loop is expected to have no measurable impact on the ability of the operators to safely cooldown the RCS and switch-over to RHR.

The T_h indication is used for monitoring natural circulation cooldown. Steam Generator Pressure is the primary means of temperature control based on the saturated steam conditions in the Steam Generator. Under low steam flow conditions, the Steam Generator saturation temperature closely approximates cold leg temperature. Knowledge of the saturation temperature corresponding to the observed steam pressure provides the best indicator of RCS conditions. T_c and T_h indications lag behind the steam pressure indication, particularly under natural circulation conditions due to the loop transit time. For this reason, the T_h indication is a secondary indication to Steam Generator pressure. For the situation of cooldown when there is forced RCS flow, there is a small differential temperature across the Steam Generator and T_c is nearly the same as the T_h and provides the same information as the inoperable T_h . For the situation of natural circulation, there is a larger differential temperature. However, the T_h of the loop without indication is approximately the same as that indicated in the other active loop with T_h indication. Abnormal operating procedures for shutdown from outside the Control Room address the use of Steam Pressure as the primary indicator of RCS temperature for comparison to the RCS Pressure (also available on the HSP) to confirm adequate subcooling margin exists during the cooldown. The procedure specifically calls for the use of steam generator pressure in the

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determination of subcooling margin, cooldown rate and RCS temperature. The operators are trained on these procedures and also to use all available instrumentation. With the operator training being refreshed, and the recently confirmed operability of the other remote shutdown indications, one T_h indication in an active loop provides sufficient confirmation for the operator to perform a controlled cooldown of the reactor coolant system.

The worst case scenario for shutdown from outside the control room is for those instances involving a fire in either the control room or the cable spreading room. The failed T_h indication is one of two which have been analyzed to remain available for operation at the HSP following a fire per the Fire Safe Shutdown Analysis. Only two have been analyzed, as only those Steam Generators fed by the Train A Auxiliary Feedwater Pump are used for plant cooldown following a postulated fire. If this event were to occur, the operator would retain indication of RCS hot leg temperature from the remaining T_h indication and use the correlations previously stated. For shutdowns other than post fire shutdown, the remaining T_h indicators (3) allow for plant cooldown.

Therefore loss of a single loop T_h indicator should have minimal safety significance with no potential for negative consequences should use of the HSP be required.

III. CAUSE OF THE EVENT

Limiting Condition for Operation (LCO) 3.3.3.2.1, "Remote Shutdown Instrumentation," requires, in part, that one Wide Range RCS Temp.- T_h per RCS Loop be OPERABLE in MODES 1, 2, and 3. ACTION Statement "a" requires that an inoperable instrument be restored to OPERABLE status within 7 days or be in at least MODE 4, HOT SHUTDOWN, within the next 12 hours.

This event was considered reportable because the time requirement for the action statement was not met. An NOED was requested and received before a violation of the Technical Specification occurred.

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IV. CORRECTIVE ACTIONS

On January 5, 1996, prior to exceeding the allowed outage time, it was recognized by TU Electric management that the additional time would be required to allow Unit 2 to operate until the scheduled refueling outage would exceed the required action statement. TU Electric believes that the required actions taken to acquire the NOED and Technical Specification change are sufficient until corrective actions to repair the inoperable T_H instrument during the upcoming Unit 2 refueling outage. Therefore, no further actions are warranted.

V. PREVIOUS SIMILAR EVENTS

There have been other previous events which resulted in exceeding Technical Specification action statements (refer to LER 445/95-001-00 and LER 445/95-004-00). However, the causes for the aforementioned events were significantly different than the subject event. Corrective actions taken to resolve the root causes of the previous events would not have prevented this event.