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2C.220

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WC-042-96

Docket No. 50-461

10CFR50.73

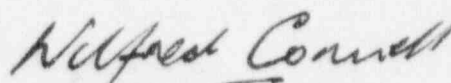
Document Control Desk
Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Clinton Power Station - Unit 1
Licensee Event Report No. 96-001-00

Dear Sir:

Enclosed is Licensee Event Report No. 96-001-00: Failure to Perform Technical Specification Required Testing of the Trip and Isolation of the Mechanical Vacuum Pumps on a Main Steam Line High Radiation Signal. This report is being submitted in accordance with the requirements of 10CFR50.73.

Sincerely yours,


Wilfred Connell
Vice President

MRS/csm

Enclosure

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety
INPO Records Center

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LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 60.0 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 20565-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Clinton Power Station		DOCKET NUMBER (2) 05000461	PAGE (3) 1 OF 3
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TITLE (4)
Failure to Perform Technical Specification Required Testing of the Trip and Isolation of the Mechanical Vacuum Pumps on a Main Steam Line High Radiation Signal

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 NUMBER
01	05	96	96	001	00	02	06	96	None	05000
									None	05000

OPERATING MODE (9) 1

POWER LEVEL (10) 100

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)

20.2201(b)	20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	50.73(a)(2)(i)	50.73(a)(2)(viii)
20.2203(a)(1)	20.2203(a)(3)(i)		50.73(a)(2)(ii)	50.73(a)(2)(x)
20.2203(a)(2)(i)	20.2203(a)(3)(ii)		50.73(a)(2)(iii)	73.71
20.2203(a)(2)(ii)	20.2203(a)(4)		50.73(a)(2)(iv)	OTHER
20.2203(a)(2)(iii)	50.36(c)(1)		50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
20.2203(a)(2)(iv)	50.36(c)(2)		50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME: T. P. Johnson, Project Specialist-Procedures
TELEPHONE NUMBER (include Area Code): (217) 935-8881, Extension 3649

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)

YES NO

Complete EXPECTED SUBMISSION DATE.

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

On January 10, 1996, Illinois Power determined that testing that was required by plant Technical Specification section 4.3.2.2, for the main steam line high radiation trip and isolation of the mechanical vacuum pumps, was not periodically performed as required by the plant Technical Specifications that were in effect from September 29, 1986, until the requirement was removed from the plant Technical Specifications on January 1, 1995. The cause of the event has been attributed to a lack of clarity of the meaning of a note in Table 3.3.2-2, CRVICS INSTRUMENTATION, of the plant Technical Specifications. Since the note was in the section that describes what functions are part of the channel operability, it was not clear that this meant that the isolation and trip of the mechanical vacuum pumps on a main steam line high radiation signal was required to be periodically tested. Corrective actions for this event include revising the procedure to add the testing requirements, testing the mechanical vacuum pump trip and isolation on a main steam line high radiation signal and reviewing the plant Technical Specifications for similar occurrence of failure to implement testing requirements shown in a note.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

DESCRIPTION OF EVENT

On January 5, 1996, the plant was in Mode 1 (POWER OPERATION) at about 100 percent reactor [RCT] power, a utility maintenance planner was researching the impact on plant operation of performing maintenance work on the main steam line radiation monitors [MON]. During the review of this work, the maintenance planner noticed that Operational Requirements Manual (ORM) Table 3.2.16-1, CRVICS INSTRUMENTATION, which lists operability requirements for the main steam line high radiation monitor containment isolation trip functions has a note that states, "also trips and isolates mechanical vacuum pumps [P]." The maintenance planner searched for the surveillance test procedure that tests the main steam line high radiation trip and isolation of the mechanical vacuum pumps. The maintenance planner was unable to find any plant procedures that tested this function of the main steam line high radiation monitors. The maintenance planner initiated Condition Report 1-96-01-017 to document that there were no procedures to test this function and to evaluate whether or not this function was required to be tested.

Investigation of this condition determined that the note in Table 3.2.16-1, CRVICS INSTRUMENTATION, of the ORM was meant to define the scope of the required functions for this instrument and thus define the scope of required testing of the mechanical vacuum pumps trip and isolation function. This testing is required as part of the logic system functional testing that is required to be performed every eighteen months by ORM Testing Requirement 4.2.16.4. Review of testing records showed that the mechanical vacuum pump trip and isolation had been tested on August 9, 1985, as part of the preoperational test program. No records could be found which documented that this feature had subsequently been tested. The investigation also revealed that this same note was included in plant Technical Specification Table 3.3.2-1, CRVICS INSTRUMENTATION, from initial issuance of the plant operating license until it was removed and relocated to the ORM by Amendment No. 95 to the Clinton Power Station (CPS) Technical Specifications. This amendment to the CPS Technical Specifications became effective on January 1, 1995. Therefore, testing of the mechanical vacuum pump trip and isolation on a main steam line high radiation signal was required by CPS Technical Specification section 4.3.2.2 every eighteen months from initial plant licensing on September 29, 1986, until implementation of Amendment No. 95 on January 1, 1995. Since this testing was required to be performed every eighteen months, and testing of the trip and isolation of the mechanical vacuum pumps on a main steam line high radiation signal had not been performed since August 9, 1985, the failure to periodically perform this test constitutes a violation of the CPS Technical Specifications that were in effect prior to January 1, 1995.

On January 10, 1996, at 1445 hours, the Shift Supervisor declared the main steam line high radiation trip and isolation of the mechanical vacuum pumps inoperable and determined that the condition was required to be reported in accordance with 10CFR50.73. At about 2006 hours, plant personnel began testing the trip and isolation of the mechanical vacuum pumps as required by the ORM. At 2133 hours the testing was completed with satisfactory results and the main steam line high radiation trip function was declared operable.

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TEXT CONTINUATION

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

CAUSE OF EVENT

The cause of the event has been attributed to a lack of clarity of the meaning of a note in Table 3.3.2-1, CRVICS INSTRUMENTATION, of the plant Technical Specifications. Since the note was in the section that describes what functions are part of the channel operability, it was not clear that this meant that the isolation and trip of the mechanical vacuum pumps on a main steam line high radiation signal was required to be periodically tested. Consequently, the person that wrote the procedure that implements the required testing either did not see the note, or did not interpret it as a testing requirement, and so a surveillance test procedure was not prepared to test this function.

CORRECTIVE ACTION

CPS procedure 9431.24, "Reactor Protection System Logic System Functional (Fuel Cycle #3)," was revised to include testing of the trip and isolation of the mechanical vacuum pumps on a main steam line high radiation signal. The trip and isolation of the mechanical vacuum pumps on a main steam line high radiation signal was satisfactorily tested on January 10, 1996.

If the ORM continues to maintain the requirement to test the trip and isolation of the mechanical vacuum pumps on a main steam line high radiation signal the presentation of that requirement will be clarified. Also, a review of the Technical Specifications will be performed to determine if there are any other notes or portions of the Technical Specification Bases which have not been properly interpreted as requiring testing of any equipment or functions of equipment.

ANALYSIS OF THE EVENT

This event is reportable under the provisions of 10CFR50.73(a)(2)(i)(B) due to the failure to perform surveillance testing in accordance with the plant's Technical Specifications.

Assessment of the safety consequences and implications of this event indicates that this event was not nuclear safety significant. The surveillance testing performed after the condition was identified shows that the mechanical vacuum pump trip and isolation on a main steam line high radiation signal would have functioned as designed.

ADDITIONAL INFORMATION

No equipment or components failed as a result of this event.

Illinois Power has not reported any other events related to failure to perform the required surveillance testing due to lack of proper interpretation of a note in the plant Technical Specifications.

For further information regarding this event, contact T. P. Johnson, Project Specialist-Procedures at (217) 935-8881, extension 3649.