NAC Form	NG NG 1912 (1913) NG 1911 NG												NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES: 8/31/85									
FACILITY	Pila	rim	Nuc	lea	r Po	ower	Sta	tion	- Un	it No	. 1				T NUMBER	-	. 2 .	9	3	,]	PAGE	(3)
TITLE (4		lequa	te	Sur	vei	llanc	e P	roce	dure		3			0 13	, 1010	10	1-1	_1	-	.,	OF	012
EVENT DATE (5) LER NUMBER (6)							RE	PORT DA	TE (7)		OTHER	HER FACILITIES INVOLVED (8)										
MONTH	QAY	YEAR	YE	AR		UENTIAL		REVISION		DAY	YEAR	FACILITY NAMES					DOCKET NUMBER(S)					
011	010	ole	0	1		lola		ماه		1							151				-	1
011	2 8	10 3	-	5		0 2	_	00								_	151	0 1	0	0		
OPERATING MODE (9)				THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR \$: (Check one or me 20,402(b) 20,408(c) 50,73(a)(2)(ii										e of the following; (11) 73.71(b)								_
POWER			+	20,408(a)(1)(i)					50.36(c)			50,73(a)(2)(v)					73,71(e)					
LEVE (10)		20.406(a)(1)(ii)					50,38(c)	(2)			50.73(a)(2)(vii)				OTHER (Specify in Abstract							
			20.406(a)(1)(iii) 20.406(a)(1)(iv)					X	50,73(e)	(2)(1)					J66		d in	Text.	NRC	Form		
									50.73(a)	(2)(U)												
			20.406(a)(1)(v)						50.73(a)	(2)(14)		50,73(a)(2)(x)										
								1	CENSEE	CONTAC	FOR THIS	LER (12)										
NAME								7						-	REA CODE		EPHO	NE NI	UMB	ER		
	Pau	IJ.	Har	nili	ton,	Sr.	Pla	int E	ngine	er										_		
															61117	1/	141	01	-	/	910	010
		_	_	-			_			MPONEN	FAILURE	DESCRIBE	D IN THIS REPO	PRT (13)				-	70			
CAUSE	SYSTEM	СОМ	PONE	NT		HER .		NPROS			CAUSE	SYSTEM	COMPONENT		ANUFAC- TURER	*	TO N					
			-				-							_	70.0	+		-	- 8			

On 1/28/85 the implementing procedures for two surveillance tests, required by the Technical Specifications (T.S.), were determined to be inadequate. The T.S. surveillances require a functional test of the MSIV and turbine stop valve reactor protection system (RPS) instrument channels and valve closure alarms. The problem was that the T.S. implementing procedures did not test the closure alarm function. The alarms provide indication only in the control room.

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)

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

Cause was determined to be a management deficiency which allowed inadequate T.S. implementing procedures. Corrective action was to revise existing procedures by adding provisions for functional testing of the subject alarms.

政治

MONTH

EXPECTED

DAY

YEAR

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-0104 EVPIRES 9/31/95

FACILITY NAME (1)	DOCKET NUMBER			LE	R NUMBER (6	PAGE (3)					
					YEAR		SEQUENTIAL NUMBER	REVISION NUMBER		П	
Pilgrim Nuclear Power Station	0 5 0 0	1012	191	3	815	_	01012	 0 10	012	OF	012

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

On 1/28/85, during steady state operation, Station personnel identified two implementing procedures of Technical Specification (T.S.) surveillance tests which were inadequate. The T.S. surveillances, listed in T.S. Table 4.1.1, are a functional test of the Main Steam Line Isolation Valve and Turbine Stop Valve instrument channels and valve closure alarms. The problem was that T.S. implementing procedures did not test the closure alarm function at the required 1-month interval. These alarms provide indication only on Panel 905 in the control room and have no logic function.

The problem was discovered by Station personnel when investigating a Quality Assurance Department finding, which stated that Station procedures, for functional testing of the above-mentioned alarms, could not be located. Further investigation showed that a functional test of the valve closure alarms is performed semi-annually as part of Procedure 8.M.1-25, MSIV Logic Channels, and 8.M.1-26, Turbine Stop Valve Closure. Cause of the problem was determined to be a management deficiency in that the two T.S. surveillance tests were not adequate.

Corrective action was to revise T.S. implementing Procedures 8.M.1-14 and 8.M.1-11, which are the MSIV and Turbine Stop Valve closure functional test procedures, to include provisions for functional testing of the valve closure alarms. In addition, a Temporary Modification (#85-11), was implemented to allow functional testing of the alarms. The MSIV and Turbine Stop Valve functional alarm tests were successfully completed on 2/14/85 and 2/19/85, respectively. These procedures, which now include the alarm functional test, will be performed in accordance with the T.S. as part of the master surveillance tracking program.

To preclude recurrence, BECo will continue with the increased effort, such as the OA audit which identified this problem, to improve the quality of the PNPS procedures that implement the Technical Specifications. Included in this effort is the development of a computerized procedure/T.S. cross reference matrix and a revision to the QA audit program which was made to expand the scope of T.S. audits.

There were no system or component failures identified during this event. This event did not impact the health and safety of the public.

A similar event was identified in LER 83-057.

BOSTON EDISON COMPANY

BOD BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON BENIDR VICE PRESIDENT NUCLEAR

> February 28, 1985 BECo Ltr. #85-044

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

> Docket Number 50-293 License DPR-35

Dear Sir:

The attached Licensee Event Report 85-002-00, "Inadequate Surveillance Procedure," is hereby submitted in accordance with the requirements of 10CFR50.73.

If there are any questions on this subject, please do not hesitate to contact me.

Respectfully submitted,

W. D. Harrington

PH:caw

Enclosure: LER 85-002-00

cc: Dr. Thomas E. Murley
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue

King of Prussia, PA 19406

Standard BECo LER Distribution