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Georgia Power

The southern electric system

HI-2357
003822

August 4, 1992

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

PLANT HATCH - UNIT 1
NRC DOCKET 50-321
OPERATING LICENSE DPR-57
LICENSEE EVENT REPORT
PERSONNEL ERROR RESULTS IN MISSED
TECHNICAL SPECIFICATIONS SURVEILLANCE

Gentlemen:

In accordance with the requirements of 10 CFR 50.73(a)(2)(i), Georgia Power Company is submitting the enclosed Licensee Event Report (LER) concerning a personnel error which resulted in a missed Technical Specifications surveillance. This event occurred at Plant Hatch - Unit 1.

Sincerely,

J. T. Beckham, Jr.

JKB/cr

Enclosure: LER 50-321/1992-019

cc: Georgia Power Company
Mr. H. L. Sumner, General Manager - Nuclear Plant
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebnetter, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

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LICENSEE EVENT REPORT (LER)

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TITLE (4)
PERSONNEL ERROR RESULTS IN MISSED TECHNICAL SPECIFICATIONS SURVEILLANCE

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQ NUM	REV	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
07	06	92	92	019	00	08	04	92		05000
										05000

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR (11)

OPERATING MODE (9) 1	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL 100	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
	20.405(a)(1)(j)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below)
	20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
	20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
	20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME STEVEN B. TIPPS, MANAGER NUCLEAR SAFETY AND COMPLIANCE, HATCH	TELEPHONE NUMBER AREA CODE 912	367-7851
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COMPLETE ONE LINE FOR EACH FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORT TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORT TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT (16)

On 07/06/92 at 0830 CDT, Unit 1 was in the Run mode at a power level of 2436 CMWT (100% rated thermal power). At that time, licensed personnel were informed that a surveillance had been missed on In-Service Testing (IST) of plant equipment. This event occurred on 10/27/91 when Unit 1 was in a refueling outage with no fuel in the vessel. The event involved the Unit 1 Core Spray system pump 1E21-C001B. After maintenance had been performed on a valve in the Unit 1 Core Spray system, the post-maintenance functional test required performance of the surveillance procedure for this system. The IST-related portions of this procedure were not performed at that time because they were not required in order to demonstrate operability of the Core Spray system. When the surveillance was performed later, it was incorrectly assumed that the surveillance had been performed as part of the post-maintenance functional test, and the surveillance was not repeated. Thus, the IST-related portions of the surveillance procedure were not performed in accordance with the required schedule.

The cause of this event was personnel error. A licensed individual failed to ensure the surveillance requirements had been satisfied before electing not to repeat the procedure.

Corrective actions for this event include counseling the responsible individual.

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PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor
Energy Industry Identification System codes are identified in the text as (EIIIS Code XX).

DESCRIPTION OF EVENTS

On 07/06/92 at 0830 CDT, Unit 1 was in the Run mode at a power level of 2436 CMWT (100% rated thermal power). At that time, the non-licensed engineer responsible for the In-Service Testing (IST) program discovered that an IST surveillance had been missed. A deficiency card was initiated in accordance with plant administrative control procedures to report the discovery to licensed personnel. The event occurred on 10/27/91 when Unit 1 was in a refueling outage with no fuel in the vessel. At that time, Core Spray (CS, EIIIS Code BM) system pump 1E21-C001B was due for surveillance per Unit 1 Technical Specifications Section 4.6.K, but the surveillance was not performed.

In May 1992, the Authorized Nuclear In-Service Inspector (ANII) was conducting a routine review of his IST surveillance records when he discovered that this surveillance appeared to have been missed. The ANII then requested that the IST engineer produce the missing data package. The IST engineer conducted a search for the data package through normal administrative channels, but when he could not find it, he tentatively concluded that it had been temporarily misplaced. Subsequently, the IST engineer requested that Operations personnel search for the missing data package. By 07/06/92, when the data package could not be located in the Operations department, the IST engineer concluded the surveillance had not been performed, and he initiated a Deficiency Card in accordance with the plant's administrative control procedures. Subsequently, it was determined that portions of the required surveillance had been performed, but that IST requirements had not been satisfied.

On 10/27/91, maintenance was performed on Core Spray system valve 1E21-F036B. The functional test and operability review which were specified following the maintenance activity required performance of portions of procedure 34SV-E21-001-1S, "CORE SPRAY PUMP OPERABILITY."

The performance of this surveillance procedure in its entirety satisfies two separate Unit 1 Technical Specification surveillance requirements. The first is Section 4.5.A.1.b which requires a verification at least once per three months that the pump is capable of producing a system flow of at least 4250 gpm at a system head corresponding to a reactor pressure of at least 113 psig. The second is Section 4.6.K which requires the pump to be tested per the IST requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI. Each specification is satisfied by portions of the same procedure. When the procedure is performed as a regularly scheduled surveillance, all the steps in the procedure are performed, thus satisfying all the Technical Specifications requirements. However, the procedure is frequently

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used for purposes other than fulfilling a surveillance requirement, such as post-maintenance functional testing or pressurizing the Core Spray system to check for leaks. When this is done, the portions of the procedure which address IST requirements are usually not performed because they are more extensive and require the use of special equipment. Therefore, the IST-related portions of the procedure are typically performed only when they are specifically requested. If they are not requested, they are marked "Not Required."

Since this procedure was not being performed as a regularly scheduled IST surveillance, the IST portions of the test were not required, were not specifically requested, and therefore were not performed. For the purpose of this post-maintenance functional test, only Core Spray pump 1E21-C001B flow and discharge pressure testing portions of the procedure were required in order to verify valve 1E21-F036B would not leak at rated pressure and flow. The functional test results were satisfactory and the Core Spray system was returned to service.

On 11/06/91, the regularly scheduled surveillance per the same procedure, 34SV-E21-001-1S, was due, and performance of IST-related portions of the procedure was required. The requirement to perform the entire surveillance, including the IST-related portions, by 11/06/91 was communicated to the Operations department via a Surveillance Tracking Sheet on 10/27/91. However, since the procedure had been performed earlier that day, a licensed individual from the Operations department believed the surveillance requirements had already been satisfied. Moreover, the entry from the Unit 1 Shift Supervisor's log for that day states that the results of the procedure were "complete and satisfactory," leading to an incorrect assumption that all portions of the surveillance procedure had been performed. This individual did not realize that only the flow and pressure portions of the procedure had been performed, and that the portions involving IST measurements had not been performed. On this basis, he returned the Surveillance Tracking Sheet with the comment, "Last performed satisfactorily on 10/27/91 - please adjust due date." Consequently, the surveillance was entered into the computerized Surveillance Tracking and Scheduling Database as having been performed on 10/27/91 and was scheduled for three months later as normal. The error was not recognized and thus, the IST surveillance requirements were not satisfied as required by 11/06/91.

On 1/22/92, the regularly scheduled surveillance was again performed, including the IST portions of the procedure. At that time, pump performance satisfied all operability requirements.

CAUSE OF EVENT

The cause of this event was personnel error. Specifically, a licensed individual misunderstood the log entry reading "complete and satisfactory" to mean that IST portions of the Core Spray system surveillance procedure had been performed. Consequently, he returned the Surveillance Task Sheet to the

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surveillance coordinator with the comment that the surveillance had already been satisfactorily performed. However, the IST portions of the Core Spray surveillance had not been performed. Per procedure 90AC-OAP-001-OS, "TEST AND SURVEILLANCE CONTROL," this individual should have obtained a copy of the completed surveillance data package and verified all the required portions of the surveillance had been performed. Instead, he completed the Surveillance Task Sheet by taking credit for the post-maintenance functional test which had only tested pump flow and pressure. As a result, the IST-related portions of the surveillance were not fulfilled.

REPORTABILITY ANALYSIS AND SAFETY ASSESSMENT

This event is reportable per 10 CFR 50.73 (a)(2)(i) because a condition which is prohibited by the plant's Technical Specifications existed. Specifically, an IST surveillance required by Unit 1 Technical Specifications Sect on 4.6.K was missed due to personnel error.

The purpose of Core Spray system is to protect the core by removing decay heat during a postulated design basis loss of coolant accident (LOCA). The Core Spray system consists of two 100% capacity pumps and necessary piping, valves and controls to connect the pumps to a spray sparger located above the core inside the reactor pressure vessel. This configuration permits the Core Spray system to spray cooling water directly onto the fuel assemblies following depressurization of the reactor pressure vessel. The system is demonstrated to be operable via a variety of surveillances, inspections and tests on the valves, piping and pumps. Among these surveillances are those performed in accordance with the ASME Boiler and Pressure Vessel Code, Section XI, which requires In-Service Testing to verify certain pump performance characteristics. These characteristics are stated in the plant's IST Plan, and they require that pump performance be compared to a set of baseline data on pump performance. The purpose of the IST Program is to ensure the integrity and operability of piping, pumps and valves by verifying that certain physical and performance characteristics are maintained. Adverse trends may be detected by comparing present system performance to the baseline data.

In this event, the IST requirements of Unit 1 Technical Specifications Section 4.6.K were not fulfilled for one surveillance interval. However, the required IST surveillance was performed on this pump during the preceding quarter and during the succeeding quarter. The pump was found to be within the acceptable range during both tests. Therefore, it is reasonable to conclude that the pump was capable of performing its intended design function should a design basis LOCA have occurred during the missed surveillance interval. Also, the redundant 100% capacity pump in the Core Spray system was not affected by the event.

Based on this analysis, it is concluded that this event had no adverse impact on nuclear safety. The analysis is applicable to all power levels.

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CORRECTIVE ACTIONS

The individual responsible for the personnel error has been counseled regarding this event.

ADDITIONAL INFORMATION

1. Other systems affected: No systems were affected other than those mentioned in this report.
2. Previous Similar Events: One event was reported in the past two years in which a Technical Specifications surveillance was missed due to an individual electing not to perform it. This event was described in LER 50-321/1991-032, dated 01/27/92. Corrective actions for that event included counseling the responsible individual and covering the event in Beginning of Shift Training. Those corrective actions would not have prevented this event because the nature of the events were different. In the previous event, the surveillance was due and was being performed, but the person performing the surveillance marked pertinent portions "Not Required." In the present event, however, the responsible individual inappropriately took credit for a previous performance of the procedure and did not repeat it when it was necessary.
3. Failed Components Information: This event did not occur as a result of failed components.