

John A. Bailey Vice President Operations

> August 5, 1992 NO 92-0229

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Mail Station P1-137 Washington, D. C. 20555

Subject: Docket No. 50-482: Licensee Event Report 92-012-00

Gentlemen:

The attached Licensee Event Report (LER) is being submitted pursuant to 10 CFR 50.73 (a) (2) (i) concerning a Technical Specification violation.

Very truly yours.

John A. Bailey Vice President Operations

JAB/aem

Attachment

cc: A. T. Howell (NRC), w/a J. L. Milhoan (NRC), w/a G. A. Pick (NRC), w/a W. D. Reckley (NKC), w/a

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LICENSEE EVENT REPORT (LER)

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On July 7, 1992, at approximately 1300 CDT, during a routine update of the surveillance database and the manual surveillance tracking system, it was discovered that the surveillance procedure which is performed to demonstrate operability of the containment personnel air lock and the containment emergency escape air lock had not been performed within the time required by Technical Specification Surveillance Requirement 4.6.1.3. The surveillance tests associated with the surveillance procedure were performed on June 25, 1992 for the containment personnel air lock and on April 15, 1992 for the containment emergency escape air lock. The surveillance tests should have been performed by May 26, 1992 and March 21, 1992, respectively.

It appears that in April of 1991 an identifier in a data field in the surveillance database was erased when an unrelated field was manually deleted in the database by a Computer Services Systems Analyst. This identifier specifies surveillance procedures whose surveillance intervals cannot be extended by 25 percent. Provisions have been made to prevent manual modifications to production data in the surveillance database. Also, a quarterly comparison will be made of the information currently in the surveillance database compared to what was in the database the previous quarter.

TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)			PAGE (3)		
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

INTRODUCTION

On July 7, 1992, at approximately 1300 CDT, during a routine update of the surveillance database and the manual surveillance tracking system, it was discovered that the surveillance procedure which is performed to demonstrate operability of the containment personnel air lock and the containment emergency escape air lock had not been performed within the time required by Technical Specification Surveillance Requirement 4.6.1.3. The surveillance tests associated with the surveillance procedure were performed on June 25, 1992 for the containment personnel air lock and on April 15, 1992 for the containment emergency escape air lock. The surveillance tests should have been performed by May 26, 1992 and March 21, 1992, respectively. Since the containment air locks were not tested within the Technical Specification Surveillance allowable interval, this event is being reported pursuant to 10 GFR 50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.

DESCRIPTION OF EVENT

Technical Specification Surveillance Requirement 4.6.1.3 requires, in part, that each containment air lock be demonstrated operable by conducting overall air lock leakage tests at not less than 48 pounds per square inch gauge, and verifying that the overall air lock leakage rate is within its limit at least once per six months. Also, at least once per six months, each containment air lock is demonstrated operable by verifying that only one door in each air lock can be opened at a time. Surveillance procedure STS PE-014, "Containment Air Locks Test," is the surveillance procedure performed to fulfill Technical Specification Surveillance Requirement 4.6.1.3 for the containment personnel air lock and the containment emergency escape air lock. Surveillance test STS PE-014A is performed for the containment personnel lock and surveillance test STS PE-014B is performed for the containment emergency escape air lock.

Technical Specification 3.6.1.3 requires, in part, that each containment air lock must be operable. With a containment air lock inoperable, at least one air lock door must be maintained closed and the inoperable air lock must be restored to operable status within 24 hours or the plant is to be in at least Hot Standby within six hours and in Cold Shutdown within the following 30 hours.

Test STS PE-014A was satisfactorily performed on November 24, 1991 and test STS PE-014B was satisfactorily performed on September 19, 1991. This information was entered into the surveillance database and the computerized scheduling program calculated an incorrect due date for the next scheduled performance of test STS PE-014A as May 26, 1992, with an incorrect late date of July 12, 1992 and an incorrect due date of March 21, 1992, with an incorrect late date of May 6, 1992 for test STS PE-014B. Test STS PE-014A was satisfactorily performed on J . 25, 1992 and test STS PE-014B was satisfactorily performed on April . , 1992.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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On July 7, 1992, at approximately 1300 CDT, while updating the surveillance database and the manual surveillance tracking system, the surveillance group discovered that the due dates and late dates for the last performances of tests STS PE-014A and STS PE-014B had been miscalculated. The surveillance database is used to track the performance of surveillance tests. A manual surveillance tracking system is kept updated using due dates and late dates calculated by the computerized scheduling program. This manual system is maintained in the event that the computerized scheduling program becomes unavailable or corrupted. The miscalculated due dates and late dates resulted in tests STS PE-014A and STS PE-014B not being accomplished within the Technical Specification surveillance allowable interval of at least once per six months. Test STS PE-014A should have been performed by May 26, 1992 instead of July 12, 1992 and test STS PE-014B should have been performed by March 21, 1992 instead of May 6, 1992.

ROOT CAUSE AND CORRECTIVE ACTIONS

An investigation following this event revealed that the late dates calculated for tests STS PE-014A and STS PE-014B by the computerized scheduling program which automatically calculates the next due date and late date based on the previous performance dates were based on a 25 percent extension which is specified in Technical Specification 4.0.2. Technical Specification 4.0.2 requires that each surveillance requirement be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified interval. However, the provisions of Technical Specification 4.0.2 are not applicable to Surveillance procedure STS PE-014 and therefore do not apply to tests STS PE-014A and STS PE-014B.

The data field in the surveillance database that contains an identifier for surveillance procedures which are not governed by Technical Specification 4.0.2 was discovered blank during a review of this event. A review of past records indicates that this identifier was present in December 31, 1990, but was missing on July 1, 1991. Because of the length of time between the time of the event and discovery an exact cause for the missing identifier could not be determined. However, it appears that in April of 1991 the identifier was erased when the information in an unrelated data field was manually deleted in the surveillance database by a Computer Services Systems Analyst.

TEXT CONTINUATION

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

Upon discovery of this event, immediate steps were taken to identify data and confirm the integrity of the identifier and its calculated dates. The identifier and the calculated dates were reloaded into the surveillance database. A review of other surveillance tests affected by the missing data in the surveillance database did not reveal any other Technical Specification violations. Provisions have been made to prevent manual modifications to production data in the surveillance data base. A computer program will be required to be written and tested prior to being used on the computerized scheduling program to make modifications to production data. In addition, a quarterly comparison will be made of the information currently in the surveillance database compared to what was in the database the previous quarter.

An evaluation is currently being conducted to evaluate the methods and controls used to make modifications to data in production applications and determine if those methods and controls are appropriate for all Computer Services supported applications. If these methods and controls are deemed inappropriate, the necessary steps to correct this situation will be accomplished by December 1, 1992.

ADDITIONAL INFORMATION

The unit operated in Mode 1, Power Operation, through Mode 3, Hot Standby, during the time that the surveillance requirements of Technical Specification 4.6.1.3 were not met for the air locks. Although the containment personnel air lock and the containment emergency escape air lock were not tested within the required time frame, the satisfactory completion of the surveillance tests on June 25, 1992 and April 15, 1992, indicates that the air locks were capable of performing their required safety function. Therefore, at no time did conditions develop that may have posed a threat to the health and safety of the public. There was no damage to plant equipment or release of radioactivity as a result of this event.

Licensee Event Report 85-084-00 desc es an event in which a required surveillance test was not accomplished within the required time frame because of an logic error in the computerized scheduling program. This event is not considered similar to the event described in this report because the logic error in the computerized scheduling program was attributed to a cognitive personnel error during development of the computer program used for scheduling of surveillance tests and did not involve manual modifications to the surveillance database.