

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) McGuire Nuclear Station - Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 3 7 1 0	PAGE (3) 1 OF 3
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TITLE (4)  
Technical Specification Surveillance Not Done by Procedure

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 NAMES		DOCKET NUMBER(S)																																		
0 2	0 4	8 5	8 5	0 0 3	0 1	0 3	0 6	8 5			0 5 0 0 0																																		
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:15%;">OPERATING MODE (9) 5</td> <td colspan="11">THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)</td> </tr> <tr> <td rowspan="6">POWER LEVEL (10)</td> <td>20.402(b)</td> <td>20.406(c)</td> <td>50.73(a)(2)(iv)</td> <td>73.71(b)</td> </tr> <tr> <td>20.406(a)(1)(i)</td> <td>50.36(c)(1)</td> <td>50.73(a)(2)(v)</td> <td>73.71(c)</td> </tr> <tr> <td>20.406(a)(1)(ii)</td> <td>50.36(c)(2)</td> <td>50.73(a)(2)(vii)</td> <td rowspan="4">OTHER (Specify in Abstract below and in Text, NRC Form 366A)</td> </tr> <tr> <td>20.406(a)(1)(iii)</td> <td><input checked="" type="checkbox"/> 50.73(a)(2)(i)</td> <td>50.73(a)(2)(viii)(A)</td> </tr> <tr> <td>20.406(a)(1)(iv)</td> <td>50.73(a)(2)(ii)</td> <td>50.73(a)(2)(viii)(B)</td> </tr> <tr> <td>20.406(a)(1)(v)</td> <td>50.73(a)(2)(iii)</td> <td>50.73(a)(2)(x)</td> </tr> </table>												OPERATING MODE (9) 5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)											POWER LEVEL (10)	20.402(b)	20.406(c)	50.73(a)(2)(iv)	73.71(b)	20.406(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)	20.406(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)	20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	20.406(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	20.406(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)
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LICENSEE CONTACT FOR THIS LER (12)

NAME Scott Gewehr - Licensing	TELEPHONE NUMBER AREA CODE: 710 14 31713   -71 5181
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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)

<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH DAY YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On February 4, 1985, the Operator Aid Computer (OAC) at McGuire Unit 2 alarmed, indicating that the Steam Generator (S/G) temperature was less than 70°F. Technical Specification (T.S.) 4.7.2 requires that when either the primary or secondary side temperature is less than 70°F, an hourly verification be made that both primary and secondary side pressures are less than 200 psig. Rather than perform this verification by means of the appropriate procedure, station personnel used administrative controls (removal and restoration checklists) to document that both the primary and secondary sides were vented to the atmosphere. This method of verification was later determined to not adequately meet the requirements of T. S. 4.7.2. When this determination was made, about 7½ hours after the OAC alarm, the appropriate procedure was initiated to document the hourly surveillance.

Corrective Actions will consist of ensuring that alternate means of meeting T.S. surveillance requirements are approved by station management, or appropriate designee(s), prior to use.

The health and safety of the public was not affected by this incident.

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

Introduction: On February 4, 1985, administrative controls were used to meet Technical Specification (T.S.) surveillance requirement 4.7.2, instead of the appropriate procedure (Steam Generator Pressure/Temperature Check). Personnel responsible for ensuring regulatory compliance decided the method used to meet the surveillance requirement was not adequate.

Unit 2 was in Mode 5 at the time of the event.

An administrative deficiency, is the cause of this event, because Operations personnel did not contact Compliance personnel when deciding on how to meet the surveillance requirement. Compliance personnel should have been contacted for an interpretation of the surveillance requirement because the method used to meet it was not normal operating practice.

Evaluation: On February 4, 1985, at 0110, the OAC computer point D4151 (Steam Generator (S/G) low temp-commence Steam Generator pressure check) alarmed. This indicated primary or secondary side S/G's temperature was less than 70°F and that the surveillance requirement of T.S. 4.7.2 needed to be made. This surveillance requirement states the following:

"The pressure in each side of the steam generator shall be determined to be less than 200 psig at least once per hour when the temperature of either the reactor or secondary coolant is less than 70°F."

To document this surveillance, Operations personnel normally use procedure PT/1/A/4150/16 (S/G Low Temperature-Pressure Check) for Unit 1 or PT/2/A/4150/16 for Unit 2. On February fourth, Operations personnel decided that administrative controls to ensure the primary and secondary side of the S/Gs were vented to atmosphere would meet the surveillance requirements, and that PT/2/A/4150/16 did not need to be documented.

Both the primary and secondary sides of the S/Gs were vented and open to atmosphere. A removal and restoration (R&R) checklist documented that steam line power operated relief valves (PORV) 2SV-1, 2SV-7, 2SV-13, and 2VS-19 were open. Another R&R checklist documented that the following primary side vents were open: 2NC-22 (Reactor Vessel Head Vent), 2NC-238 (Reactor Vessel Head Vent), 2NC-214 (N<sub>2</sub> to Vessel Head), and 2NC-51 (Pressurizer Relief Tank Vent). R&R checklists are kept in the control copy of the appropriate operating procedure until the valves are returned to their normal positions. The checklists are then routed by the Operations Unit Coordinator to the Document Control Group for microfilming and storage.

The secondary side of S/G D was empty and S/G's A, B, and C were draining. On the primary side, level was below the U tubes in the S/Gs. The residual heat removal system (ND) pumps were recirculating the primary coolant and there were no other flow inputs to the reactor coolant (NC) system. Level in the NC system was being monitored at least once every five minutes to ensure adequate water level for ND pump suction. The level was monitored using a tygon tube shown on a television screen in the Control Room. Any level changes would indicate additional inputs into

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the system. The pressurizer relief tank (PRT) was aligned to the NC system via the PORV. If pressure in the PRT increased to 8 psig, an alarm would be received in the Control Room. In addition, the PRT rupture disk would rupture at 100 psig, relieving pressure.

Because the R&R checklist provided continuous assurance that the primary and secondary sides of the S/Gs remained at atmospheric pressure, Operations personnel believed the surveillance requirement was met. The Control Room Operators discussed this with an Assistant Shift Supervisor and the Shift Engineer. The consensus was that the surveillance requirement was met. Entries were made in the Reactor Operators (RO) logbook and the Shift Supervisors logbook to document the method used in meeting the surveillance requirement.

At approximately 6:30 the same morning, the Unit 2 Operating Engineer was asked if the manner in which the surveillance was being met was adequate, and he thought it was. At approximately 8:00 the Shift Operating Engineer was informed of the way the surveillance requirement was being met. Although he felt the requirement was being met, the Shift Operating Engineer had the Operators start documenting the surveillance on PT/2/A/4150/16, to ensure all paperwork was in order.

Compliance personnel decided the method used to meet the surveillance requirement did not satisfy the requirement as it is written in T. S. 4.7.2. T.S. 4.7.2 states that pressure must be verified hourly. Although the administrative controls used ensured a vent to atmosphere existed, a direct, hourly pressure verification was not documented. Compliance personnel are responsible for obtaining interpretation of Technical Specifications. They should have been consulted when making the decision to meet the surveillance requirement using a method that was not normally practiced.

Corrective Actions: Operations personnel have been instructed to consult Compliance personnel, whenever a T. S. surveillance requirement is addressed by a method that is not normal practice, to ensure that the method is acceptable.

DUKE POWER COMPANY

P.O. BOX 33189  
CHARLOTTE, N.C. 28242

HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

TELEPHONE  
(704) 373-4531

March 7, 1985

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

Subject: McGuire Nuclear Station, Unit 2  
Docket No. 50-370  
LER 370/85-03

Gentlemen:

Pursuant to 10 CFR 50.73 Sections (a)(1) and (d), attached is Licensee Event Report 370/85-03, concerning a Technical Specification surveillance requirement which was not performed by the appropriate method, which is submitted in accordance with §50.73 (a)(2)(i). This event was considered to be of no significance with respect to the health and safety of the public.

Very truly yours,

*H. B. Tucker*

Hal B. Tucker

SAG/mjf

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

INPO Records Center  
Suite 1500  
1100 Circle 75 Parkway  
Atlanta, Georgia 30339

M&M Nuclear Consultants  
1221 Avenue of the Americas  
New York, New York 10020

Mr. W. T. Orders  
NRC Resident Inspector  
McGuire Nuclear Station

American Nuclear Insurers  
c/o Dottie Sherman, ANI Library  
The Exchange, Suite 245  
270 Farmington Avenue  
Farmington, CT 06032

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