NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/85

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Limerick Generating Station-Unit 1	0 5 0 0 0 3 5 2	1 OF 0 4

TITLE (4)
Procedural deficiency in the daily surveillance log

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)
1 0	2 7	8 4	8 4	0 0 1	0 0	1 1	2 6	8 4		0 5 0 0 0
										0 5 0 0 0

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)	0 1 0	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
		20.405(a)(1)(i)	50.36(a)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(a)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	X 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	TELEPHONE NUMBER
B. L. Clark, Sr. Engineer, Special Projects	AREA CODE 2 1 5 — 8 4 1 4 5 0 1 1 7

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)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

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

Abstract: 84-001

On October 27, 1984 at approximately 1:30 p.m. during fuel loading prior to initial criticality, a single control rod was withdrawn while the reactor was in operational condition 5 (refueling), channel checks of the four scram discharge volume level transmitters and the four refueling area ventilation exhaust duct radiation monitors were not performed as required by the plant's Technical Specifications. Upon discovery of these omissions, channel checks were performed and the Daily Surveillance Log ST-6-107-591, was revised to clarify these surveillance actions. These revisions were formally approved by the facility's Plant Operational Review Committee on October 30, 1984.

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

Description of the Event:

On October 27, 1984, at approximately 1:30 p.m. with the facility at zero percent power level during the initial core loading, a single control rod was withdrawn while in operational condition 5 (refueling). Table 4.3.1.1-1(8a) of the Technical Specifications requires that in operational condition 5, with any control rod withdrawn, a 12-hour channel check must be performed on the four scram discharge volume (SDV) level transmitters. However, channel checks to the four SDV level transmitters as required per Surveillance Test ST-6-107-591-1 'Daily Surveillance Log' were not performed on the 7 a.m. to 3 p.m. shift of October 27, 1984, because, at the time the operator took the reading and marked it "N/A", no control rods were withdrawn. Channel checks of the SDV level transmitters were performed on the prior 11 p.m. to 7 a.m. shift and the subsequent 3 p.m. to 11 p.m. shift.

In addition, Table 4.3.2.1-1(7c) of the Technical Specifications requires that the four refueling area ventilation exhaust duct radiation monitors must be channel checked every twelve hours during Core Alteration. However, this surveillance requirement was not identified in the Daily Surveillance Log ST-6-107-591-1. As a result, the channel checks for the four refueling area ventilation exhaust duct radiation monitors were not performed prior to the 3 p.m. to 11 p.m. shift of October 27, 1984.

Following the discovery of the failure to perform the channel checks of the four SDV level transmitters and the four refueling area ventilation exhaust duct radiation monitors, a temporary procedure change (TPC) was made to the daily surveillance log surveillance test ST-6-107-591-1 and channel checks were performed for both the SDV level transmitters and the refueling area ventilation exhaust duct radiation monitors during the 3 p.m. to 11 p.m. shift of October 27, 1984. Unfortunately, the format of the TPC lacked clarity and as a result, the subsequent shift misinterpreted the TPC and did not perform the channel checks of the four refueling area ventilation exhuast duct radiation monitors during the period 11 p.m. to 7 a.m. ending October 28, 1984. This omission was recognized on the 7 a.m. to 3 p.m. shift of October 28, 1984 and the refueling area ventilation exhaust duct radiation monitor channel checks were resumed at that time. The format of the TPC regarding the refueling area ventilation exhaust duct radiation monitor channel checks was subsequently improved for clarity.

Consequences of the Event:

The results of the channel checks of the four SDV level transmitters revealed a zero percent level in the SDV during the shift prior to and the shift immediately following the shift in which the SDV level transmitter channel checks were not performed. In addition, since startup activities at this time cause all control rods to be fully inserted except for friction tests of single rods, no reactor conditions could have taken place to require a scram.

The results of the channel checks of the four refueling area ventilation exhaust duct radiation monitors revealed measured quantities indicative of normal fluctuations of background radiation. Since the reactor has not been critical, only background radiation is possible in the plant at this time.

Cause of the Event:

The failure to perform the required channel checks of the SDV level transmitters was caused by a misinterpretation by operations personnel of the Surveillance Test ST-6-107-591-1 "Daily Surveillance Log".

The failure to perform the required channel checks of the refueling area ventilation exhaust radiation monitors was caused by a procedural deficiency (Surveillance Test ST-6-107-591-1 did not include this channel check) and a misinterpretation by operations personnel of the temporary procedure change to the Surveillance Test ST-6-107-591-1.

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

Corrective Actions:

As stated above, following discovery of the missed SDV level transmitter channel checks and the refueling area ventilation exhaust duct radiation monitor channel checks, a TPC was made to ST-6-107-591-1 during the 3 p.m. to 11 p.m. shift on October 27, 1984 to clarify the requirements of performing channel checks to the SDV level transmitters during operational condition 5. This change now requires performance of SDV level transmitter channel checks when in operational condition 5, whether or not control rods are being withdrawn.

The same TPC also added the requirements of performing channel checks to the refueling area ventilation exhaust duct radiation monitors. This latter change requires channel checking during operational conditions 4 (Cold Shutdown) and 5 (Refueling).

The modified SDV level transmitter channel check requirement and the requirement to perform refueling area ventilation exhaust duct radiation monitor channel check were formally approved by the Limerick Generating Station Plant Operational Review Committee as revision 5 to ST-6-107-591-1 on October 30, 1984. In addition, a review of the Technical Specifications against the written Surveillance Tests has been initiated.

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November 26, 1984

Docket No. 50-352

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

SUBJECT: Licensee Event Report

This LER concerns a procedural deficiency in the Daily Surveillance Log pertaining to performance of scram discharge volume level transmitter and refueling area ventilation exhaust duct radiation monitor channel checks as required by the Technical Specifications 4.3.1.1 and 4.3.2.1 respectively.

Reference:	Docket No. 50-352
Report Number:	84-001
Revision Number:	00
Event Date:	October 27, 1984
Report Date:	November 26, 1984
Facility:	Limerick Generating Station Box A, Sanatoga, PA 19464

This LER is submitted pursuant to the requirements of 10 CFR 50.73 (a)(2)(i).

Very truly yours,

W. T. Ullrich
Superintendent
Nuclear Generation Division

cc: Dr. Thomas E. Murley, Administrator
Region I, USNRC

See Attached Service List

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cc: Judge Helen F. Hoyt
Judge Jerry Harbour
Judge Richard F. Cole
Judge Christine N. Kohl
Judge Gary J. Edles
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