



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MAR 7 1983

MEMORANDUM FOR: Richard W. Starostecki, Director
Division of Project and Resident Programs
Region I

FROM: Karl V. Seyfrit, Chief
Reactor Operations Analysis Branch
Office for Analysis and Evaluation
of Operational Data

SUBJECT: SALP REVIEW FOR INDIAN POINT 2: FEBRUARY 1, 1982
TO JANUARY 31, 1983.

In response to R. C. Haynes's memorandum of November 26, 1982, AEOD has reviewed and evaluated the LERs submitted for Indian Point Unit 2. AEOD's review has focused on the accuracy and completeness of the licensee's reporting. The results of our review are as follows:

Reporting - Licensee Event Reports (February 1, 1982 to January 31, 1983)

Consolidated Edison Company of New York generally provides accurate and complete LERs, including attachments of additional information. The licensee does not consistently report component failures to NPRDS. Consequently, numerous component failures were not identified as reportable to NPRDS.

If you have any questions regarding this matter, please contact Narinder K. Trehan of my staff and he can be reached at FTS-492-4435.

A handwritten signature in cursive script, appearing to read "Karl V. Seyfrit".

Karl V. Seyfrit, Chief
Reactor Operations Analysis Branch
Office for Analysis and Evaluation
of Operational Data

cc: John Hannon, ORBI

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MAR 15 1983

MEMORANDUM FOR: Richard C. Lewis, Director
Division of Project and Resident Programs, Region II

FROM: Karl V. Seyfrit, Chief
Reactor Operations Analysis Branch, AEOD

SUBJECT: EVALUATION OF BRUNSWICK 1 AND 2 LERs COVERING THE PERIOD
JANUARY 1, 1982 TO DECEMBER 31, 1982

In support of the upcoming SALP review of the Carolina Power and Light Company in regard to their performance as licensee of the Brunswick steam electric plants, AEOD has assessed the licensee event reports (LERs) submitted under Docket Nos. 50-324/325 during the subject period. Our perspective is indicative of a knowledgeable BWR system safety engineer who is not, however, intimately familiar with the detailed site-specific equipment arrangements and operations. Our review focused on the technical accuracy, completeness, and intelligibility of the LERs. Our review covered the LERs submitted during the appraisal period which were in our data base.

In general, the LER submittals were usually acceptable. The LERs typically provided clear and concise descriptions of the events. Only one of the more than 350 LERs reviewed was not submitted on or before the due date. However, LERs often did not provide a clear indication of the effects on system function. Moreover, related or repetitive events were rarely specifically cited even though a general statement that an event was repetitive often would be. Also, root causes and symptoms were only infrequently provided even when they would have clarified the event.

Our screening for trends and patterns produced several cases which could indicate potential management weakness. These included: (1) the large number of LERs submitted during the review period; (2) the large number of procedural deficiencies reported; (3) lack of followup reports committed to; and (4) incorrect operator actions indicating possible training problems. The enclosure provides a summary of the events in these categories.

Over 360 LERs were submitted by the licensee for both units. The concern over this large number of LERs is somewhat reduced by the fact that four repetitive events evidently represent almost 50% of LERs reported.* These four events are: (1) trickle flow errors in reference legs; (2) procedural deficiencies; (3) failures in the containment oxygen analyzers; and

* This conclusion is based on a random sample of 50 LERs from those submitted.

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Richard C. Lewis

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(4) defective control rod reed switches. The first two events are being resolved generically while the latter two pose little challenge to plant safety. Twenty-three LERs reviewed reported procedural problems. This problem area has previously been identified as related to management control over plant systems. Sixteen LERs reviewed committed to providing a followup report but only four followup reports were found in our data base by March 8, 1983. Even discounting events in the last quarter of the assessment period, only about one third of the promised followup reports were found. Four LERs reported incorrect actions by plant personnel. Two of these were operator failure to recognize plant Technical Specification LCO or action requirements. We believe that this may indicate a potential training program problem (LER 81-92 and 81-93 on Unit 1).

Six LERs reviewed reported multiple events. Moreover, two LERs reported chronologically and causally unrelated events in a single LER (LER 82-24 on Unit 1 and LER 81-69 on Unit 2). We would request that multiple unrelated events be reported in separate LERs if possible to assure that the data base is properly established.

From our perspective, we would consider the licensee's LER submittals, as reflected in all of the LERs reviewed, to be adequate. Our screening produced more cases which indicate potential management weakness than we would expect at an "average" BWR facility over the course of one year.

If you have any questions, please contact either myself or John Pellet (492-4438) of my staff.

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Karl V. Seyfrit, Chief
Reactor Operations Analysis Branch, AEOD

Enclosure:
As stated

cc w/enclosure:
SMcKay, NRR
DMyers, Region II

bcc w/enclosure:
DCS
AEOD RF
AEOD SF
CHeltemes
KSeifrit
JPellet
SRubin

OFFICE	ROAB ^{atP}	ROAB	C/ROAB ^S	D/AEOD			
SURNAME	JPelletPab	SRubin ^{SR}	KSeifrit	CHeltemes			
DATE	03/11/83	03/11/83	03/14/83	03/15/83			

TERS WHICH MAY SUGGEST MANAGEMENT WEAKNESS

Inadequate Procedures

<u>Unit 1</u>	<u>Unit 2</u>
82-3	82-3
82-70	82-82
82-72	82-89
82-81	82-91
82-85	82-94
82-89	82-97
82-93	82-100
82-94	82-101
82-96	82-103
82-97	82-104
82-98	
82-99	
82-103	

Followup Report Promised/Not Found

<u>Unit</u>	<u>Promised</u>	<u>Found?</u>
1	81-93	Yes
1	82-13	Yes
1	82-24	Yes
1	82-26	No
1	82-62	No
1	82-108	No
1	82-116	No
1	82-122	No

<u>Unit</u>	<u>Promised</u>	<u>Found?</u>
2	82-22	No
2	82-24	No
2	82-69	No
2	82-83	Yes
2	82-88	No
2	82-93	No
2	82-121	No
2	82-143	No

Incorrect Plant Personnel Actions

<u>Unit 1</u>	<u>Unit 2</u>
81-92	82-5
81-93	
82-88	

Multiple Occurrences in a Single Report

<u>Unit 1</u>	<u>Unit 2</u>
82-24	81-69
	82-14
	82-41
	82-133
	82-140