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D. F. Packer
General Manager
Plant Operations
Waterford 3

W3F1-92-0414
A4.05
QA

September 26, 1992

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

Subject: Waterford 3 SEF
Docket No. 50-382
License No. NPF-38
Reporting of Licensee Event Report

Gentlemen:

Attached is Licensee Event Report Number LER-92-009-00 for Waterford Steam Electric Station Unit 3. This Licensee Event Report is submitted pursuant to 10CFR50.73(a)(2)(i)(B).

Very truly yours,

D.F. Packer
General Manager - Plant Operations

DFP/TWG/ssf
Attachment

cc: J.L. Milhoan, NRC Region IV
G.L. Florreich
J.T. Wheelock - INPO Records Center
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office
Administrator - LRPD

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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20545, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) **Waterford Steam Electric Station, Unit 3** DOCKET NUMBER (2) **0 5 0 0 0 3 8 2 1** PAGE (3) **1** OF **0 6**

TITLE (4) **Surveillance Interval Exceeded as a Result of Inadequate Administrative Control**

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 8 2 7	9 2 9	2 0 0 9	0 0 9	0 0 0	9 2 6	9 2	N/A		0 5 0 0 0		
									N/A		0 5 0 0 0

OPERATING MODE (9) **1** THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)

20.402(b)	20.406(e)	50.73(a)(2)(iv)	73.71(b)
20.405(a)(1)(i)	50.38(c)(1)	50.73(a)(2)(v)	73.71(c)
20.405(a)(1)(ii)	50.38(c)(2)	50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	50.73(a)(2)(vii)(A)	
20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(vii)(B)	
20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME **J.G. Hoffpauir, Plant Maintenance Superintendent** TELEPHONE NUMBER **5 0 4 4 6 4 - 3 1 3 8**

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15) MONTH DAY YEAR

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

ABSTRACT

On August 27, 1992, Waterford SES, Unit 3 was operating at 100% power when it was noted that the broad range gas detection system (BRGDS) channel calibrations specified by Technical Specification (TS) 4.3.3.7.3 had not been performed within the required periodicity. At 0802, both channels of the BRGDS were declared inoperable and the Control Room Ventilation System was placed in the isolate mode of operation as specified by the TS 3.3.3.7.3 Action requirements.

The root cause of this event is inadequate administrative control in that appropriate guidance did not exist to backup the first line supervisor to ensure that the surveillance was performed as required. In the future, this responsibility will be assigned to the duty I&C Maintenance Superintendent. Also, Operations personnel will track the completion of weekly surveillances.

The channel calibrations were satisfactorily performed and the BRGDS was declared operable at 0949 on August 27, 1992. Because both channels of the system were within specifications, no threat to the health and safety of the public or plant personnel existed.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1) Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2) 0500038292	LER NUMBER (8)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		92	009	00	2	OF	06

TEXT (If more space is required, use additional NRC Form 360A's) (17)

REPORTABLE OCCURRENCE

On August 27, 1992, Waterford SES, Unit 3 was operating at 100% power when it was noted that the broad range gas detection system (BRGDS; EHS Identifier VI-45) channel calibrations required by Technical Specification (TS) Surveillance 4.3.3.7.3 had not been performed within the specified periodicity. At 0802, both channels of the BRGDS were declared inoperable and the Control Room Ventilation System (EHS Identifier VI) was placed in the isolate mode of operation as specified by TS 3.3.3.7.3 Action requirements. Failure to perform a surveillance test within the specified periodicity is a condition prohibited by Technical Specifications and is reportable under 10CFR50.73(a)(2)(i)(B).

INITIAL CONDITIONS

Plant Power:	100%
Mode:	1
Procedures Being Performed Specific to this Event:	None
Technical Specification LCO's in Effect Specific to this Event:	None
Major Equipment Out of Service Specific to this Event:	None

EVENT SEQUENCE

Administrative Procedure UNT-005-015, "Work Authorization Preparation and Implementation," defines the process by which planning personnel prepare a work package for routine, recurring work activities, such as surveillance tests required by technical specifications. Planners prepare the necessary work packages based on scheduling information provided by another group. The work packages are transferred to scheduling personnel for additional processing and then forwarded to the responsible supervisor.

In addition to the normal planning and scheduling process, the Technical Specifications Coordinator is responsible for the coordination and monitoring of the Technical Specifications surveillance program in accordance with Administrative Procedure UNT-007-004, "Technical Specification Surveillance

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TEXT (If more space is required, use additional NRC Form 305A's) (17)

Control." While it remains the responsibility of the first line supervisor to perform assigned surveillances prior to the late date, the TS Coordinator monitors the status of required tests and is responsible for alerting responsible departments to the existence of potential problems.

Technical Specification surveillance requirement 4.3.3.7.3 states, in part, that "each broad range gas detection system shall be demonstrated OPERABLE by performance of a . . . channel calibration at least once per 7 days." Maintenance tasks 015830 and 015831 to perform the BRGDS channel calibration required by TS 4.3.3.7.3 were scheduled to be performed on August 25, 1992. However, the tests had not been performed when the interval specified by the Technical Specifications, including the twenty-five percent extension allowed by TS 4.0.2, expired at 0125 on August 27, 1992.

When it was determined that the BRGDS channel calibrations specified by TS 4.3.3.7.3 had not been performed within the required periodicity, both channels of the BRGDS were declared inoperable at 0802 on August 27, 1992. The Control Room Ventilation System was placed in the isolate mode of operation as specified by TS Action requirements.

The channel calibrations were satisfactorily performed and the BRGDS was declared operable at 0949 on August 27, 1992. The control room ventilation system was returned to its normal lineup at 0956.

CAUSAL FACTORS

The root cause of this event is inadequate administrative control in that appropriate guidance did not exist to backup the I&C supervisor responsible for the performance of the surveillance. In this case, the responsible supervisor was absent from the site. He incorrectly assumed that, in his absence, the Operations Department would recognize that the surveillances had not been performed and initiate action to complete the tests before the late date was exceeded.

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TEXT (If more space is required, use additional NRC Form 306A's) (17)

Contrary to the supervisor's assumption, the Operations Department does not routinely track the performance of all routine surveillances. Rather, the status of TS surveillances is provided to the Shift Supervisor/Control Room Supervisor by the TS Coordinator. In this event however, the TS Coordinator was not on site and could not alert the control room that the surveillance interval was expiring. As a result, the control room staff was unaware that the surveillance had not been completed.

In the supervisor's absence, responsibility for the performance of the surveillance was not specifically delegated to another responsible individual. The backup that would normally be provided by the Technical Specifications Coordinator was not available because he was not on site. And finally, a real-time tracking mechanism did not exist to ensure that the test was completed as scheduled.

In summary, the existing administrative controls were inadequate because with two key individuals absent from the site, the surveillance was not completed and the problem went unnoticed until after the surveillance was overdue.

NON-CAUSAL FACTORS

On August 24, 1992, Waterford 3 was in an Unusual Event as a result of Hurricane Andrew. This led to a number of individuals being absent from site which revealed the weakness in administrative control.

CORRECTIVE MEASURES

Both channels of the BRGDS were declared inoperable and the Control Room Ventilation System was placed in the isolate mode of operation as specified by the TS Action requirements. The channel calibrations were satisfactorily performed and the BRGDS was declared operable at 0949 on August 27, 1992.

In the future, responsibility for the timely completion of I&C surveillances will be assigned to the duty I&C Maintenance Superintendent. If for any reason the

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responsible first line supervisor is not able to ensure the completion of the surveillance, it will be the responsibility of the duty I&C Maintenance Superintendent to ensure that proper action is taken with regard to the specific task.

Secondly, the completion of weekly TS surveillances will be tracked by the control room staff in accordance with Operations Procedure OP-903-001, "Technical Specification Surveillance Logs."

In addition, specific instructions regarding shift I&C technician awareness of TS surveillances will be added to I&C Maintenance Directive 13.

Finally, this event as well as the importance of timely completion of TS required surveillances will be discussed at an I&C shop meeting.

It is expected that all of the corrective actions related to this event will be complete by January 13, 1993.

SAFETY SIGNIFICANCE

Because both channels of the system were within specifications when the channel calibrations were eventually performed, no threat to the health and safety of the public or plant personnel existed.

SIMILAR EVENTS

LER's 86-006, 87-014, and 87-031 reported events in which surveillances were not completed within the required periodicity because of inadequate administrative controls. Unlike the event described here, the earlier LER's resulted from problems associated with tracking surveillances in special circumstances. LER 86-006 discussed and conditional surveillance which was required by a mode change; LER 87-014 described a problem caused by a failure to reschedule a subsequent surveillance when the previous test had been completed early. Finally, LER 87-031 reported an event which was caused by a failure to

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reschedule a surveillance which was not performed because the equipment was out of service.