NRC Form 306 (9-83)  LICENSEE EVENT REPORT (LER)											U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES: 8/31/85													
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On 7/20/84 the Gaseous Radwaste System was verified operable with the satisfactory completion of the associated loop calibration surveillance. During operation, excess oxygen appeared in the system due to no hydrogen addition, therefore the cxygen monitors were turned off and ACTION 42 to Technical Specification 3.3.3.10(b) was entered. Sampling required by ACTION 42 was performed between 8/28/84 and 9/26/84 except for 9/12/84 and 9/20/84 when the system was not in operation.

On 9/11/84 it was discovered that after a switching evolution of Gas Decay Tanks, the wrong Gas Decay Tank was sampled from 9/6/84 to 9/11/84. Upon discovery, the sampling was switched to the on-line Gas Decay Tank.

On 10/4/84 it was discovered that on 9/27/84 the Gaseous Radwaste System was returned to the operable status without the satisfactory completion of the associated analog channel operational test surveillance. Upon discovery, the requirements of ACTION 42 were initiated.

Due to plant conditions, the subject events posed no threat to the public health and safety.

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U.S. NUCLEAR REGULATORY COMMISSIO LICENSEE EVENT REPORT (LER) TEXT CONTINUATION APPROVED OMB NO. 3150-0104 CYDIGES 2/21/95 DOCKET NUMBER (2) FACILITY NAME (1) LER NUMBER (6) YEAR Callaway Plant Unit 1 2 OF 0 0 |5 |0 |0 |0 |4 |8 | 3 |8 |4 |- 0 | 3 |8 |- 0 |0 |0 |

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

On 7/20/84 the Gaseous Radwaste System (HA) was verified operable with the satisfactory completion of the loop calibration surveillance ISL-HA-000Al, "LOOP ANALYZER: Waste Gas Analyzer." During operation, excess oxygen appeared in the system due to no hydrogen addition. Therefore, the oxygen monitors were turned off and ACTION 42 to Technical Specification 3.3.3.10(b) was entered. With both oxygen monitor channels inoperable ACTION 42 requires the oxygen supply to be suspended to the recombiners and grab samples to be taken at least once per 24 hours during operations. Oxygen was suspended and the required sampling performed between 8/28/84 and 9/26/84, except for 9/12/84 and 9/20/84 when the system was not in operation and sampling was not required.

On 9/11/84 it was discovered that the wrong Gas Deray Tank had been sampled. On 9/6/84 a switching evolution of the in-service tank occurred from Gas Decay Tank 6 (THA01G) to Gas Decay Tank 1 (THA01A). When this switching evolution occurred the Chemistry department, responsible for sampling, was not made aware of the switch of in-service tanks and continued sampling Gas Decay Tank 6. Upon discovery, sampling was initiated on the in-service tank, Gas Decay Tank 1.

On 10/4/84 it was discovered that on 9/27/84 the Gaseous Radwaste System was returned to the operable status without satisfactorily completing the analog channel operational test surveillance ISF-HA-000Al, "FUNCTIONAL ANALYZER: Waste Gas Analyzer." Technical Specification 4.3.3.10-1, which is the surveillance requirements for the Gaseous Radwaste System, is a conditional surveillance and is only required during Waste Gas Holdup System operation. On 9/27/84 the system was returned to an operable status by the Radwaste Department, responsible for the Gaseous Radwaste System, assuming that ISF-HA-000Al had been kept current. The Instrumentation and Controls (I&C) Department, responsible for performing ISF-HA-000Al, had not kept the analog channel operational test surveillance current since the Compliance Department, responsible for scheduling surveillances, was unaware that the system was being returned to an operable status, and therefore failed to schedule ISF-HA-000Al to be performed. Upon discovery, the requirements of ACTION 42 were initiated.

Actions taken to prevent recurrence are as follows:

- A Radwaste off-normal operating procedure, RTO-HA-00001, "Operation of the Gaseous Radwaste System with Inoperable Gas Monitors," was issued 9/17/84 to establish what sequence of events need to take place when gas monitors are declared inoperable, and notes that Chemistry is to be notified when the in-service Gas Decay Tank is being switched.
- ISF-HA-000Al has become a routine monthly surveillance and will be performed whether or not the Gaseous Radwaste System is in operation.

NRC FORM 366A 9-831

NRC Form 196A (9-83)	U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO: 3150-0104 EXPIRES: 8/31/85						
FACILITY NAME (1)		DOCKET NUMBER (2)	. u	ER NUMBER (6)	PAGE (3)		
			YEAR	SEQUENTIAL REVISION			
Callaway Pla	nt Unit 1	0  5  0  0  0  4   8 3	814 -	01318-010	0 3 0 0 0 3		

TEXT (If more space is required, use additional NAC Form JOBA's) (17)

- 3. Radwaste will notify the Control Room whenever the Gaseous Radwaste System is being declared inoperable, and confirm with them that the associated surveillances are current before returning the system to an operable status. This will be added to off-normal operating procedure RTO-HA-00001 by 10/20/84.
- 4. Other conditional surveillances have been reviewed for similar situations, and no discrepancies were found.

Due to plant conditions, the subject events posed no threat to the public health and safety.

Previous occurrences: none

## UNION ELECTRIC COMPANY CALLAWAY PLANT

P.O. BOX 620 FULTON, MO. 65251

October 11, 1984

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

ULNRC-945

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
FACILITY OPERATING LICENSE NPF-25
LICENSEE EVENT REPORT 84-038-00
TECHNICAL SPECIFICATION VIOLATION

Gentlemen:

The enclosed Licensee Event Report is submitted pursuant to 10 CFR 50.73(a)(2)(i) concerning the inoperability of the Gaseous Radwaste System.

S. E. Miltenberger
Manager, Callaway Plant

JED/JAR/CDN/RRG/drs Enclosure

cc: Distribution attached

IE22

cc distribution for ULNRC-945

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N. Date