

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) OYSTER CREEK, UNIT 1	DOCKET NUMBER (2) 0 5 0 0 0 2 1 9	PAGE (3) 1 OF 0 4
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TITLE (4)
REACTOR LOW-LOW-LOW LEVEL SENSOR OUT OF SERVICE LONGER THAN ONE HOUR

EVENT DATE (5)			LER NUMBER (8)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)
0 1	1 0	8 5	8 5	0 0 1	0 0	0 2	1 2	8 5			0 5 0 0 0
											0 5 0 0 0

OPERATING MODE (9) N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)						
POWER LEVEL (10) 0 9 8	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(e)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)			
	<input type="checkbox"/> 20.406(a)(1)(i)	<input type="checkbox"/> 50.36(a)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(e)			
	<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 50.36(a)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 305A)			
	<input type="checkbox"/> 20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)				
	<input type="checkbox"/> 20.406(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)				
<input type="checkbox"/> 20.406(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)					

LICENSEE CONTACT FOR THIS LER (12)	
NAME Michael J. Fitzgerald, Operations Engineer	TELEPHONE NUMBER AREA CODE: 6 0 9 9 7 1 - 4 3 8 2

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS		

SUPPLEMENTAL REPORT EXPECTED (14)			EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO					

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

During the monthly test of the Reactor Low-Low-Low Water Level sensors, one of the sensors remained out of service for a period greater than 1 hour (approximately 1 hour 7 minutes). This exceeds the 1 hour limit requirement in the Technical Specifications. The cause was attributed to personnel error, and additionally, this limit was not identified in the surveillance procedure. Short term corrective action was to have the responsible department instruct its personnel on the out of service time limit. Long term corrective action will be to revise the applicable surveillance procedures to include the identification of this limit and its Technical Specification requirement. A similar event was previously reported in LER 50-219/82-25.

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TEXT (If more space is required, use additional NRC Form 388A's) (17)

DATE OF OCCURRENCE

The event occurred on January 10, 1985.

IDENTIFICATION OF OCCURRENCE

During surveillance testing of Reactor Low-Low-Low Water Level sensor RE-18A, the sensor remained out of service for longer than 1 hour. This exceeds the time limit in Section 3.1, Table 3.1.1 of the Technical Specifications.

This event is considered to be reportable in accordance with 10 CFR 50.73(a)(2)(i)(B).

CONDITIONS PRIOR TO OCCURRENCE

The plant was operating at 98% thermal power and 660 MWe.

DESCRIPTION OF OCCURRENCE

During the monthly test of the Reactor Low-Low-Low Water Level instrument channels, sensor RE-18A remained out of service for approximately 1 hour and 7 minutes. This exceeds the 1 hour limit given in the Technical Specifications. The events involved with the testing of the sensor are as follows:

The sensor is isolated from the process line. At this point the sensor is considered out of service. The previously vented test equipment is set up, and water under pressure is used to ensure that all air is vented from the sensor and associated tubing. The pressure on the "high side" of the sensor is increased until the sensor trips, and the test pressure at this point is the "as found" trip point. By procedure, this value must be ≤ 126.4 inches H₂O (4.57 psig). The sensor is then adjusted to trip at TT5 - 119 inches H₂O as read on the test manometer (4.155-4.299 psig), and upon completion of testing the sensor is valved back into service.

During the subject test, it took approximately twenty-six (26) minutes to get the air vented from the test equipment and the sensor and to reach the trip point. During the next thirty-seven (37) minutes, the sensor was in the tripped condition twenty (20) times in an attempt to reset the sensor within the desired range. (It should be noted that when a sensor is in the

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TEXT (If more space is required, use additional NRC Form 308A's) (17)

tripped condition, it is not considered out of service.) Eight (8) minutes were taken to disconnect the test equipment and return the sensor to service. The total time out of service was recorded as 1 hour 11 minutes., yet, the sensor was in the tripped condition for approximately 4 minutes of that time.

APPARENT CAUSE OF OCCURRENCE

The major cause of the event was personnel error. The technician performing the surveillance was aware of the one hour out-of-service time limit, but was not made aware that this was a Technical Specification requirement. In addition, control room personnel did not monitor the length of time the sensor was out of service; however, they were aware that it was out of service. Other factors which significantly contributed to this event were as follows: 1) The technician was instructing two other technicians who had never performed this surveillance; 2) The procedure did not contain precautions to identify to the technician that the 1 hour out-of-service limit is a Technical Specification requirement; 3) The Barton sensor used for this application has proven difficult to reset within a small band, as required for this application due to the repeatability of the sensor; 4) The RE-18A sensor was the first sensor tested, and a certain degree of re-familiarization with the surveillance is required.

ANALYSIS OF OCCURRENCE AND SAFETY ASSESSMENT

The Reactor Low-Low-Low Water Level sensors provide input to the Auto Depressurization System logic (ADS). This system would open the Electromatic Relief Valves in order to depressurize the reactor in the event of a small break LOCA. For the Low-Low-Low sensors, there are two independent channels, each with redundant sensors. During the surveillance, each sensor is valved out individually, which leaves the redundant sensor in that channel plus both sensors in the alternate channel operable.

The one-hour out of service limit for a sensor is based on several factors: 1) the increased probability of an unsafe failure for a one-out-of-one trip system versus a one-out-of-two trip system; 2) The probability that the one channel being relied upon is inoperable at the start of the test; 3) the probability that an event will occur during testing which requires sensor actuation; 4) an unsafe failure rate of $2.5 \times E^{-6}$ per hour for the channel (from the Technical Specification Basis) and; 5) a test interval of one month.

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The safety significance of this event is minimal, due to the fact that the redundant sensor and both sensors in the alternate channel were operable. In addition, sensor RE-18A itself was operable and, if necessary, could have been placed in the tripped condition.

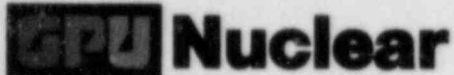
CORRECTIVE ACTION

The short term corrective action was to have the responsible department instruct their personnel on the Technical Specification requirement for sensor out of service time. The long term corrective action is to revise applicable surveillance or administrative procedures to include a caution for the out of service time limit and the applicable Technical Specification requirement. Control room personnel have been directed to closely monitor the conduct of instrument surveillance. This LER will also be required reading for applicable departments.

EQUIPMENT DATA

Although the RE-18A sensor did not fail, there was difficulty in resetting the snap-action-type switch. Since this has occurred in the past with similar switches by the same manufacturer, the data on the sensor is listed below for reference:

Manufacturer: ITT Barton
Model: 278



GPU Nuclear Corporation
Post Office Box 388
Route 9 South
Forked River, New Jersey 08731-0388
609 971-4000
Writer's Direct Dial Number:

February 12, 1985

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

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Licensee Event Report

This letter forwards one (1) copy of Licensee Event Report (LER)
No. 85-001.

Very truly yours,

Peter B. Fiedler
Vice President and Director
Oyster Creek

PBF:PC:dam (#0720A)
Enclosures

cc: Dr. Thomas E. Murley, Administrator
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

NRC Resident Inspector
Oyster Creek Nuclear Generating Station
Forked River, NJ 08731

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