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# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

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

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)	
		YEAR SEQUENTIAL REVISION NUMBER NUMBER		
Catawba Nuclear Station, Unit 1	0  5  0  0  0  4   1 3	8   5 - 0   0   5 - 0   0	0   2 OF 0	

Technical Specification 3/4.3.1, Table 3.3-1 concerns the operability of the Reactor Trip System Instrumentation. Items 2, 3, 4, 18.c, d, e, and f apply to the Power Range Nuclear Instrumentation. Item 18.f of the table applies to the Power Range Channels during Modes 1 and 2, but below the 10% power level (NOT P-10 condition). The P-10 signal is used to block or enable the Nuclear Instrumentation Trip Logic. 3 out of 4 channels in the "NOT P-10" condition enable the trip logic, while 2 out of 4 channels in the P-10 condition allow the Operator to block the trip logic. Since 3 out of 4 channels are needed to enable the trip logic, all four channels are required in the "NOT P-10" condition. With less than four channels operable, the P-10 interlock must be verified to be in its required state for that existing plant condition within 1 hour.

Item 18.e of Table 3.3-1 applies to the Power Range Channels with the reactor above 10% power (P-10 condition). In this condition, only 3 channels are required to be operable since 2 out of 4 channels allow the Operator to block the trip logic.

Technical Specification 3.0.4 states that an "OPERATIONAL MODE" cannot be entered unless the Limiting Conditions for Operations are met without relying on the associated Action Statement. As Technical Specification 3.0.4 applies to 18.f, the unit cannot enter Modes 1 or 2 if the plant is in the Action Statement.

The Final Draft of Catawba Unit 1 Technical Specifications was issued on May 25, 1984. On June 13, 1984, a meeting was held between Duke Power, and the Reactor Systems Branch and the Instrumentation and Controls System Branch of the NRC. ON June 20, 1984, Duke Power Company received comments from the NRC as a result of the meeting. The Unit 1 Fuel Load License was received on July 18, 1984. Item 18.f concerning the "NOT P-10" requirement was added to Technical Specifications between June 10th and July 18th, via a Duke Power letter dated June 29, 1984.

Power Range Channel N-44 was removed from service on December 5, 1984, at 1700 hours. On January 2, 1985, Procedure TP/1/A/2100/02 (Zero Power Physics Testing Controlling Procedure) was begun. The signal from inoperable detector N-44 was routed to test equipment for monitoring reactivity. N-44 was returned to service on January 8, 1985, at 1230 hours. While N-44 was declared inoperable, Unit 1 entered Mode 2 on two occasions, which is prohibited Technical Specification 3.0.4. All four Power Range Channels are required to be operable in Mode 2.

Power Range Channel N-42 was removed from service on January 8th, at 1245 hours, and connected to the test equipment. This channel was not returned to service until January 18th, at 2320 hours. While N-42 was inoperable, Unit 1 entered Mode 2 on three different occasions.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)	
		YEAR SEQUENTIAL REVISION NUMBER NUMBER		
Catawba Nuclear Station, Unit 1	0 5 0 0 4 1	385-005-00	0 3 OF 0 3	

This incident is classified as a Personnel Error. Two entries were made to the Technical Specification Action Item Log (TSAIL) to comply with the requirements of Items 2, 3 and 4 of Table 3.3-1. One entry was made for N-44 on December 5, 1984. The other entry was made for N-42 on January 8, 1985. Items 2, 3, and 4 of Table 3.3-1 require 3 Power Range Channels to be operable in Modes 1 or 2. Also, Technical Specification 3.0.4 does not apply to these items. The personnel responsible for making the TSAIL entries were not aware of Item 18.f, which requires all 4 channels to be operable.

A contributing cause is a result of the Technical Specification review. The Technical Specification change, which added the "NOT P-10" requirement, was not identified. The station Compliance group is responsible for comparing the Technical Specifications to identify changes and transmit these changes per Station Directive 2.1.7. During a review to identify changes to the Final Draft of the Technical Specifications, this item was overlooked, and therefore, not identified as a change.

# CORRECTIVE ACTION

An Operator Update was issued to ensure that all licensed personnel are aware of the "NOT P-10" Technical Specification requirement. Changes were made to Instrumentation Procedures IP/1/A/3240/04C (Excore Nuclear Instrumentation System (ENB) Power Range Channel Calibration), IP/0/A/3240/11 (Excore Nuclear Instrumentation System Calibration at Power), and IP/0/A/3240/12 (Excore Nuclear Instrumentation System (ENB) Removing Channels from Service). Steps were added to notify the Control Room Operator and the Senior Reactor Operator that an Action Statement will be entered if a channel is removed from service while in Modes 1 or 2 below 10% power. A Technical Specification change will be pursued so that Technical Specification 3.0.4 will not apply to Item 18.f. This will allow the unit to enter Mode 2 while in the Action Statement.

#### SAFETY ANALYSIS

During Zero Power Physics Testing, the Power Range High Setpoint Trip Logic was set to trip at approximately 20% Indicated Power. With one Power Range Channel inoperable, any one of the remaining three channels exceeding the setpoint would have generated a reactor trip. Also, the Intermediate Range Trip Logic was operable and set to trip at approximately 25% of Indicated Power.

The health and the safety of the public were not affected by this incident.

NRC FORM 366A

# DUKE POWER COMPANY P.O. BOX 33189 CHARLOTTE, N.C. 28242

HAL B. TUCKER VICE PRESIDENT NUCLEAR PRODUCTION

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February 15, 1985

TELEPHONE (704) 373-4531

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

Subject: Catawba Nuclear Station, Unit 1 Docket No. 50-413

Gentlemen:

Pursuant to 10 CFR 50.73 Section (a) (1) and (d), attached is Licensee Event Report 413/85-05 concerning a power range channel being inoperable during mode change. This event was considered to be of no significance with respect to the health and safety of the public.

Very truly yours,

H.B. Tuchen 1 Mar

Hal B. Tucker

RWO:s1b

## Attachment

cc: Dr. J. Nelson Grace, Regional Administrator U. S. Nuclear Regulatory Commission Region II 101 Marietta Street, NW, Suite 2900 Atlanta, Georgia 30323

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Robert Guild, Esq. P. O. Box 12097 Charleston, South Carolina 29412

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M&M Nuclear Consultants 1221 Avenue of the Americas New York, New York 10020

NRC Resident Inspector Catawba Nuclear Station