NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION

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

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Limerick Generating Station - Unit 1	0 5 0 0 0 3 5 2	1 OF 0 4

TITLE (4)
Inoperable Scram Discharge Volume Level Switch

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 1	1 8	8 5	8 5	- 0 1 4	- 0 0	0 2	1 5	8 5		0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
2		20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)	0 0 3	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	X 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
John C. Nagle, Engineer/Supervisory, Special Projects	AREA CODE 2 1 5 8 4 1 - 5 1 8 4

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	

SUPPLEMENTAL REPORT EXPECTED (14)

		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

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

Abstract: 85-014

On January 18, 1985, with Unit 1 at 3.5 percent power in startup, surveillance testing of the Reactor Protection System (RPS) scram discharge volume high water level switch resulted in the trip channel being inoperable for greater than the two-hour limit allowed for surveillance testing purposes by Table 3.3.1-1 of the Technical Specifications. Technical Specification 3.3.1.a requires that, with the number of channels operable less than required by Table 3.3.1-1, the inoperable channel be placed in the tripped condition within one hour. Therefore, if the surveillance test cannot be successfully completed within two hours from the start of the test, the affected trip channel must be placed in the tripped condition within one additional hour. The surveillance test exceeded the allowable time and the contractor instrument and control technician performing the test did not satisfy procedural requirements and notify shift operations that the time limit had been exceeded. The affected trip channel remained in the untripped condition for a total of seven and one-half hours until the surveillance test was completed and the trip channel declared operable.

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Description of the Event:

On January 18, 1985, with Unit 1 operating at 3.5 percent power in the startup mode, an instrument and control technician was performing surveillance test ST-2-047-603-1, "Reactor Protection System - Scram Discharge Volume Water Level-High, Division IIB, Channel B2 Calibration/Functional Test", on the scram discharge volume float switch LS4-047-1N013D.

Table 3.3.1-1 of the Technical Specifications allows an instrument channel to be placed in an inoperable status for up to two hours for required surveillance without placing the trip channel in the tripped condition provided at least one operable channel in the same trip system is monitoring the parameter. The redundant channel was operable during performance of the surveillance test.

The surveillance test of the float switch began at 10:07 a.m. and the two-hour limit expired at 12:07 p.m. At that time, the instrument and control technician performing the test should have notified shift operations that the two-hour limit had ended. At that time, the limiting condition for operation of Technical Specification 3.3.1 would have been entered, which requires two channels per trip system to be operable in the startup mode. With the number of operable channels less than required by the minimum operable channels per trip system requirement, the inoperable channel should have been placed in the tripped condition within one additional hour.

The surveillance test was completed and the affected channel returned to operable status at 5:30 p.m. However, the affected channel was never placed in the tripped condition, therefore exceeding the allowable Technical Specification time constraints for placing the inoperable channel in the tripped condition.

Consequences of the Event:

The Technical Specifications allow one instrument channel to be made inoperable for the two-hour interval referenced above in order to conduct the required surveillance and an additional hour to place the affected channel in the tripped condition. The tripping of both scram discharge volume high water level channels

will produce a reactor scram. The failure to place the inoperable trip channel in the tripped condition when required resulted in the scram discharge volume high level scram being in violation of Technical Specifications for a period of approximately four and one-half hours.

Cause of the Event:

This event was caused by personnel error in that the contractor instrument and control technician performing the surveillance test did not adhere to the procedural requirements of the surveillance test.

Section IV, "Precautions and Limitations", of the above Surveillance Test indicated that the channel is to be restored within two hours of starting the test or notify shift operations. Additionally, the start time is recorded on the surveillance test and the technician is required to be aware of, and satisfy the time constraints of the test.

While performing the surveillance test, the technician had difficulty in calibrating the setpoint of the float switch since the setting was not clearly marked on the scram discharge volume. Additionally, during performance of the surveillance test, the technician occasionally reset the affected trip channel to allow for scram time testing of control rods to be performed. Subsequently, performance of the surveillance test exceeded the two-hour time period allowed by the Technical Specifications. Since the technician performing the test did not notify the operating shift, the channel was not placed in the tripped position within an additional hour as required by Technical Specification 3.3.1.a when the two-hour limit expired.

Corrective Actions:

The technician involved was issued a written warning on the importance of adherence to procedural requirements and communication with the operating shift.

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
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TEXT (If more space is required, use additional NRC Form 366A) (17)

Additional training regarding shift operations and procedural requirements for Surveillance Test Instrument and Control technicians was conducted during the first week of February. The remainder of the Instrument and Control Technicians will receive this training by March 1, 1985.

Additional control mechanisms to ensure that allowable surveillance test time periods are not exceeded without proper notification to shift operations are being evaluated.

PHILADELPHIA ELECTRIC COMPANY

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February 15, 1985

Docket No. 50-352

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

SUBJECT: Licensee Event Report
Limerick Generating Station - Unit 1

This LER deals with the inoperability of a scram discharge volume level switch.

Reference:	Docket No. 50-352
Report Number:	85-014
Revision Number:	00
Event Date:	January 18, 1985
Report Date:	February 15, 1985
Facility:	Limerick Generating Station P.O. Box A, Sanatoga, PA 19464

This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(vii).

Very truly yours,

W. T. Ullrich
Superintendent
Nuclear Generation Division

cc: Dr. Thomas E. Murley, Administrator, Region I, USNRC
J. T. Wiggins, Senior Site Inspector
See Service List

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January 16, 1985