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Abstract: 85-013

On January 17, 1985, with Unit 1 at 3.5 percent power, the High Pressure Coolant Injection (HPCI) system steam supply pressure instrument, PT-55-1N058F, was removed from service for troubleshooting. This device is part of the HPCI low steam supply pressure isolation logic and serves to close the outboard HPCI steam supply isolation valve. Technical Specifications require placing this instrument in the tripped condition within one hour after it is declared inoperable if operability cannot be restored within the one-hour period. The transmitter was not placed in the tripped condition as required. Upon discovery of this oversight, the HPCI steam supply isolation valves were placed in the closed position to isolate the HPCI steam supply line.

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Description of the Event:

On January 17, 1985, at 11:06 a.m., pressure transmitter PT-55-1N058F was removed from service and declared inoperable. This device is part of the High Pressure Coolant Injection (HPCI) low steam supply pressure isolation logic. This logic consists of two trip systems with two channels per trip system. PT-55-1N058B and F comprise one trip system, and PT-55-1N058D and H comprise the other trip system. Actuation of both transmitters in either trip system closes a particular HPCI steam supply isolation valve.

Technical Specification 3.3.2.b requires that with one of the above transmitters inoperable, declare that channel inoperable and place the inoperable instrument in the tripped condition within one hour. Contrary to this requirement, PT-55-1N058F was not placed in the tripped condition within one hour after being declared inoperable. This resulted in a failure to comply with an action statement of the Technical Specifications.

Consequences of the Event:

PT-55-IN058F inoperability does not affect the ability of the HPCI system to perform its design function. Although the HPCI low steam line pressure signals close the HPCI steam supply isolation valves, these signals are not required to ensure isolation of the HPCI system in the event of a line break. Additionally, isolation of the HPCI system due to low steam line pressure would still have been accomplished since PT-55-IN058D and H were operable at the time of the event and actuation of these devices would have closed the HPCI inboard steam supply valve to effect the isolation. There were no adverse consequences.

Cause of the Event:

The operating range of PT-55-1N058F is 0-200 psig. The transmitter output is 4-20 maDC over this operating range. At normal reactor operating pressure, the transmitter output increases to a maximum of 28 maDC and locks at this upper limit. A control room alarm is received if this upper value exceeds 30 maDC. The transmitter is still operable over its required

A-2

NAC Form 366A

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S NUCLEAR REGULATORY COMMISSION

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

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operating range, but the alarm indicates that the transmitter output is higher than normal.

A maintenance request form had been prepared to investigate this high output signal from PT-55-1N058F. The transmitter was removed from service on January 17, 1985 at 11:06 a.m. to troubleshoot the problem. When it was determined that adjustments would take several hours to perform, the transmitter should have been placed in the tripped condition.

At the time of the event, the HPCI system was out-of-service. Operations personnel believed that since HPCI was already out-of-service, PT-55-lN058F did not have to be placed in the tripped condition. However, operability of this device was still required, by Technical Specifications, in the existing plant operating condition. Failure to place PT-55-lN058F in the tripped condition within the required time frame was the cause of the event.

Corrective Actions:

On January 18, 1985, at 4:30 p.m., it was realized that no action had been taken to address the inoperability of PT-55-1N058F as required by Technical Specification 3.3.2. The appropriate action should have been to place PT-55-1N058F in the tripped condition. However, the more conservative action of closing both HPCI steam supply isolation valves was performed at this time.

PT-55-1N058F was repaired and returned to service on January 18, 1985.

Additionally, the Operations Engineer has issued a letter to shift personnel for the purpose of clarifying the requirements and action statements of Technical Specification 3. . 2.

PHILADELPHIA ELECTRIC COMPANY 2301 MARKET STREET P.O. BOX 8699 PHILADELPHIA, PA. 19101 (215) 841-4000 February 19, 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 failure to comply with an action statement of Technical Specification 3.3.2. Docket No. 50-352 Reference: Report Number: 85-013 Revision Number: 00 Event Date: January 17, 1985 February 19, 1985 Report Date: Limerick Generating Station Facility: P.O. Box A, Sanatoga, PA 19464 This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i). Very truly yours, 30 Wellet 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

cc: Judge Helen F. Hoyt Judge Jerry Harbour Judge Richard F. Cole Troy B. Conner, Jr., Esq. Ann P. Hodgdon, Esq. Mr. Frank R. Romano Mr. Robert L. Anthony Ms. Phyllis Zitner Charles W. Elliott, Esq. Zori G. Ferkin, Esq. Mr. Thomas Gerusky Director, Penna. Emergency Management Agency Angus Love, Esq. David Wersan, Esq. Robert J. Sugarman, Esq. Martha W. Bush, Esq. Spence W. Perry, Esq. Jay M. Gutierrez, Esq. Atomic Safety & Licensing Appeal Board Atomic Safety & Licensing Board Panel Docket & Service Section (3 Copies) James Wiggins Timothy R. S. Campbell