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)
SUSQUEHANNA STEAM ELECTRIC STATION - Unit 2	0 5 0 0 0 3 8 8	1 OF 0 3

TITLE (4)
RWCU Isolation during Instrument Calibration/Technical Specification Misinterpretation.

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 5 0 0 0
0 9	2 9	8 4	8 4	— 0 2 0	— 0 0	1 0	2 9	8 4		0 5 0 0 0

OPERATING MODE (9)	1
POWER LEVEL (10)	1 0 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

	20.402(b)		20.405(c)	X	50.73(a)(2)(iv)
	20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)
	20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)
	20.405(a)(1)(iii)	X	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)

	73.71(b)
	73.71(c)
	OTHER (Specify in Abstract below and in Text, NRC Form 366A)

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Benjamin L. Wilks	AREA CODE 7 1 7 — 5 4 2 - 1 3 9 1 1 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	
A	C E	P D S	B 0 8 0	N							
A	C E	P D S	B 0 8 0	N							

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)

At 1400 hours on 09-29-84 an LCO was entered in accordance with T.2 3.3.2(b) due to calibration of the RWCU System high flow differential pressure switch PDIS-G33-N044A. At approximately the same time, a jumper used to bypass the instrument's trip signal fell, causing valve F001 to shut, isolating the RWCU System. Valve F001 was reopened at 1417 hours and calibration continued. At 1800 hours valve F001 was shut in accordance with action 23 of T.S. table 3.3.2-1. However, operators misinterpreted T.S.3.3.2 (b) and should have closed valve F001 at 1700 hours. Calibration of PDIS-G33-N044A continued until 1930 hours; F001 was opened at 2000 hours and the LCO was cleared.

The switch, PDIS-G33-N044A was last calibrated on 08-31-84 following set point drift that resulted in an isolation of the system. Evaluation of the performance of PDIS-G33-N044A is continuing.

Isolation of the RWCU System is an Engineered Safety Feature (ESF) actuation due to the closure of the system's Containment Isolation Valve. The occurance of this event had no adverse effects on the health and safety of the public.

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

Discussion of RWCU System Isolation

At 1300 hours on September 29, 1984, pressure differential instrument PDIS-G33-N044A, one of two indenpendently used for sensing high flow conditions (and system isolation) in the RWCU System influent piping in Containment, was observed to be indicating high system flow. A work authorization was initiated to calibrate PDIS-G33-N044A.

At 1400 hours a limiting condition for operation (LCO) was entered in accordance with Technical Specification 3.3.2 action (b) since PDIS-G33-N044A's trip function was jumpered to prevent isolation of RWCU during calibration. Following installation of the jumper, states links were opened at the local panel in order to observe the switch's contact action during calibration. While opening the link, the jumper came loose and fell causing the trip signal to close valve F001, isolating the RWCU system. Isolation of the RWCU system is an ESF actuation due to closure of the systems containment isolation valve. By 1417 hours, valve F001 was reopened, the jumpers were reinstalled and calibration of pressure differential instrument continued.

With PDIS-G33-N044A still inoperable, operators in accordance with interpretation of T.S. 3.3.2(b), 3.3.2(b*) and action 23 of Table 3.3.2-1, closed valve F001 at 1800 hours making the RWCU system inoperable. Following the isolation of the RWCU system at 1800 hours, sampling of the reactor coolant conductivity was initiated in accordance with T.S. 3.4.4 and continued until 2130 hours; valve F001 was opened at 2000 hours at which time the LCO in accordance with T.S. 3.3.2 was cleared.

During calibration PDIS-G33-N044A's trip setting was found to have drifted conservatively to an isolation trip setting of 8.05 inches of water or a flow of 330 gpm. The trip setpoint for this instrument is 11.26 inches of water or a system flow of 415 gpm. The instruments setpoint was recalibrated to 11.15 inches of water.

PDIS-G33-N044A was last calibrated on August 31, 1984, following setpoint drift that resulted in an isolation of the system. The performance of this instrument will be evaluated following future testing.

The proper placement of jumpers during maintenance activities was discussed with the personnel involved with the inadvertent isolation of the RWCU system. This occurance caused no adverse affects on the health and safety of the public.

Discussion of Technical Specification Interpretation

During the occurance, an LCO was entered at 1400 hours in accordance with T.S. 3.3.2, action (b), since PDIS-G33-N044's trip function was jumpered to prevent isolation of the RWCU during calibration. Operators then reviewed Technical Specification sections 3.3.2(b), 3.3.2(b*), and action 23 of Table 3.3.2-1 believing that these sections allowed 1 hour, 2 hours, and 1 hour respectively, for a total of 4 hours before having to close valve F001. Subsequent review of the event revealed Technical Specification section 3.3.2(b) and 3.3.2(b*) allow a total of 2 hours, not 3 hours (1 plus 2) as originally interpreted. As a result, operators later closed valve F001 isolating the RWCU system at 1800 hours (4 hours after 1400 hours) rather than at 1700 hours as required by Technical Specifications.

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

Operators will be trained in the proper interpretation of Technical Specification 3.3.2(b), 3.3.2 (b*), and action 23 of Table 3.3.2-1 to prevent a recurrance of this event in the future.

PP&L Pennsylvania Power & Light Company
Two North Ninth Street • Allentown, PA 18101 • 215/770-5151

October 29, 1984

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

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 84-020-00
ER 100450 FILE 841-23 Docket No. 50-388
PLA-2341 License No. NPF-22

Attached is Licensee Event Report 84-020-00. The event was determined to be reportable per 10CFR50.73(a)(2)(iv) in that an unplanned Engineered Safety Feature (ESF) actuation occured during the Calibration of a differential pressure instrument; resulting in the isolation of the Reactor Water Clean Up System. Also, during the same occurrence, the misinterpretation of a Technical Specification resulted in a report pursuant to 10CFR50.73(a)(2)(i).

H. W. Keiser
Superintendent of Plant - Susquehanna

BLW/jls

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