

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Davis-Besse Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 3 4 6	PAGE (3) 1 OF 0 3
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TITLE (4)
Surveillance Requirement Late Date Exceeded for Fire Hose Stations

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		
1	1	2 3 8 4	8 4	0 1 7		1	2 2 6 8 4				
									DOCKET NUMBER(S) 0 5 0 0 0		
									0 5 0 0 0		

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)									
POWER LEVEL (10) 0 9 0	20.402(b)	20.405(e)	50.73(a)(2)(iv)	73.71(b)						
	20.405(a)(1)(i)	50.36(e)(1)	50.73(a)(2)(v)	73.71(e)						
	20.405(a)(1)(ii)	50.36(e)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 305A)						
	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)								

LICENSEE CONTACT FOR THIS LER (12)

NAME Jan Stotz	TELEPHONE NUMBER AREA CODE: 4 1 9 2 5 9 - 5 0 0 0
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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
				N					

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

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

On August 21, 1984 at 0855 Hours, the Technical Specification late date for Surveillance Requirement 4.7.9.3a was exceeded. The requirement is for a visual inspection of the Fire Hose Stations on a monthly basis checking to ensure all required equipment is available. The test was completed five hours and thirty-five minutes late. As completed, the test found no deficiencies. The event was noted on the stations Deviation Report (DVR) 84-139, but it was not categorized as requiring an LER at that time. However, on November 23, 1984 the Resident NRC Inspector informed the station that our interpretation was incorrect. Any failure to comply with an individual Tech Spec Limiting Condition for Operation (LCO) was reportable, per 10CFR 50.73 Section (A)(2)(i)(B) even when it doesn't require a unit shutdown.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		84	017		02	OF	03

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

Description of Occurrence: On August 21, 1984 at 0855 hours, the Technical Specification late date was exceeded for Surveillance Requirement 4.7.9.3a which calls for a monthly check of the fire hose stations (KP) to assure all required equipment is at the station. The Fire Hose, Fire Hose Stations, and Fire System Valve Testing, ST 5016.09 was in progress at the time, but was not completed until 1430 hours on August 21, 1984. The late date was exceeded by five hours and thirty-five minutes. Without the surveillance requirement satisfied, the equipment is considered inoperable. The action statement of Technical Specification 3.7.9.3 allows one hour to make the correction, which could not be met. Therefore, the limiting Condition of Operation (LCO) was not met. However, since T.S. 3.0.3 (which would require a unit shutdown) is not applicable to T.S. 3.7.9.3, the event was not considered reportable per 10CFR50.73 (A)(2)(i)(A)

However, on November 23, 1984, the Resident NRC Inspector informed the station that our interpretation of reportability was incorrect. He said that failure to be able to comply with any individual Tech Spec LCO is reportable. Therefore, this event is being reported per 10CFR 50.73 (a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications.

Designation of Apparent Cause of Occurrence: The late date for the ST 5016.09 monthly requirements was missed because the shop person who normally does the fire hose station walkdown was unavailable at the time the activity should have been started to ensure completion before the late date. The shop supervisor failed to recognize the impending problem. The scheduler for the shop is not responsible to ensure the activity on time, and although the Surveillance Test Engineer did note the test approaching its late date, it was too late to get it completed on time. The scheduling system provides a time frame for completing a test (an early and a late date). If a test is done within that window, the Technical Specification late date will never be exceeded. The T.S. late date requires consideration of not only the date of the previous test, but also the date of the third previous test. To ensure both of these conditions are met, the computer system builds some conservatism into the scheduled late date. People have come to expect that the Tech spec late date is actually a couple of days later than the late date on the schedule. This all depends on when the third previous test was done. This contributed to the shops incorrect assumption that there was adequate time to complete the test.

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

Analysis of Occurrence: Completing the monthly surveillance requirement five hours and thirty-five minutes late created no adverse safety consequences. When the test was completed it showed that all required equipment was available at the fire hose stations.

Corrective Action: On October 1, 1984, the station converted its computerized Surveillance Test Schedule System to the new program on the Davis-Besse Maintenance Management System. This new system is capable of providing the exact Tech Spec late date information. The new system makes Tech Spec late date information available without hand calculations. The new system also provides a Critical Surveillance Test Report which is run daily and lists tests which are getting close to their Tech Spec late date. This focuses attention on these problem tests.

Failure Data: There are no previous occurrences of this test missing its Tech Spec late date. This is also the first scheduled Surveillance Test in the last year that was missed and caused the station to violate an LCO.

Report No: NP-33-84-19

DVR No(s): 84-179



December 26, 1984

Log No. K84-1393
File: RR 2 (NP-33-84-19)

Docket No. 50-346
License No. NPF-3

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

Gentlemen:

LER No. 84-017
Davis-Besse Nuclear Power Station Unit 1
Date of Occurrence: August 21, 1984

Enclosed is Licensee Event Report 84-017 which is being submitted in accordance with 10CFR50.73, to provide 30 day written notification of the subject occurrence.

Yours truly,

A handwritten signature in cursive script that reads "Stephen M. Quennoz".

Stephen M. Quennoz
Plant Manager
Davis-Besse Nuclear Power Station

SMQ/bec

Enclosure

cc: Mr. James G. Keppler,
Regional Administrator,
USNRC Region III

Mr. Walt Rogers
DB-1 NRC Resident Inspector

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