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System (NSSSS) Group I isolation signal was produced. All Main Steam Isolation Valves and main steam line drain valves were in the closed position prior to this event. While performing the surveillance test, one turbine stop valve was opened to greater than 90% initiating an isolation signal from the associated NSSSS channel by removing the low condensor vacuum isolation signal bypass. The isolation signal could not be reset as required by the test procedure. The Instrument and Controls (I & C) technician continued the surveillance test by opening a second stop valve, which produced an isolation signal from its associated NSSSS channel. The combination of these two isolation signals resulted in a full NSSSS Group I isolation signal. The isolation signals were reset and the surveillance test was completed. The I & C technician was counseled on the proper performance of surveillance tests.

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NRC Form 366A 15-831	LICENSE	E EVENT REPO	RT	(L	ER)	т	EX	TC	ONT	INU	ATIC	N		U	6. NUI	PROVED O	OULATOR	1 50-0	
FACILITY NAME (1)		Station	DOCKET NUMBER 121							L	-	UMBER	6)		PAGE 131				
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UNIT I			0	15	5 11	0	0	0 3	15	12	814	_	0	12	4 _	010	012	OF	013

Description of the Event:

During surveillance testing of the Unit 1 Turbine Stop Valve Fast Closure Trip prior to initial criticality on December 5, 1984 at approximately 8:00 a.m., a full Nuclear Steam Supply Shutoff System (NSSSS) Group I isolation signal was produced. Since all Main Steam Isolation Valves (MSIVs) and main steam line drain valves were in the closed position prior to this event, no actual isolation occurred.

During the initial performance of the surveillance test on the midnight to 8:00 a.m. shift on December 5, 1984, a section of the test which would normally prevent the initiation of the Low Condenser Vacuum NSSSS isolation signal was changed to cause actuation of the isolation signal. This approved procedure change was made to facilitate more complete testing of the RPS/NSSSS response to a Turbine Stop Valve Fast Closure signal. As a result of this change, any one stop valve opening greater than 90% causes the production of a partial isolation signal from the affected NSSSS channel. Additionally, opening a second stop valve while the partial isolation signal from the first valve is still present could result in a full NSSSS Group I isolation signal, depending on which channels are involved.

While performing the surveillance test on the midnight to 8:00 a.m. shift on December 5, 1984, one turbine stop valve was opened to greater than 90% in accordance with the test and a partial isolation signal was received from the affected NSSSS channel. The changes to this surveillance test procedure also included a directive to reset any RPS/NSSSS isolation signals resulting from each turbine stop valve testing. In this event, the isolation signal could not be reset because of a block which affected a portion of the reset logic. Following the change of shift to the day shift on December 5, 1984, the Instrument and Controls technician continued the surveillance testing without having the previously initiated partial isolation signal reset. At approximately 8:00 a.m. on December 5, 1984, a second turbine stop valve was opened to greater than 90% causing a partial isolation signal from its associated NSSSS channel as well. The combination of these two isolation signals resulted in the production of a full NSSSS Group I isolation signal.

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Limerick	Generating Station		DOCKET NUMBER (2)											EA 16)			PAGE 13			
Unit 1			0	15	10	0	10	131	512	8	4	-	01	24	-	010	01	30	FO	В

Consequences of the Event:

This event occurred prior to initial criticality on Unit No. 1 with the reactor at zero percent power level. All Main Steam Isolation Valves were closed prior to this event and remained closed during the event. Therefore, there were no adverse consequences due to this event.

Cause of the Event:

The cause of this event was a combination of procedural deficiency and personnel error. The procedure did not specifically identify the fact that a partial isolation signal would be produced while testing each of the turbine stop valves, however, it did include specific instruction to reset any NSSSS isolation signals resulting from each stop valve testing. The I & C technician violated this procedure by not reseting the isolation signal which was received while testing the first turbine stop valve before continuing to test the second stop valve. The directive to reset any NSSSS isolation signals did not provide for signoff by the personnel performing the test to verify that the step had been completed.

Corrective Actions:

Contacts in the portion of the reset logic which were affected by the block were jumpered, the isolation signals were reset, and the surveillance test was completed. The I & C technician was counseled on the proper performance of surveillance tests. The surveillance test is being revised to clarify the procedural steps and to include a signoff for the isolation reset. Classes for the I & C technicians will be held on the proper performance of surveillance tests to preclude future occurrences.

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4000 January 4, 1985

Docket No. 50-352

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

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SUBJECT: Licensee Event Report Limerick Generating Station - Unit 1

This LER concerns the initiation of a Group I Nuclear Steam Supply Shutoff System (NSSSS) isolation signal. This event occurred prior to initial criticality.

Reference:	Docket No. 352
Report Number:	84-024
Revision Number:	00
Event Date:	December 5, 1984
Report Date:	January 4, 1985
Facility:	Limerick Generating Station
	P.O. Box A, Sanatoga, PA 19464

This LER is submitted pursuant to the requirements of 10CFR50.73 (a)(2)(iv).

Very truly yours,

millint

W. T. Ullrich Superintendent Nuclear Generation Division

CC: Dr. Thomas E. Murley, Administrator, Region I, USNRC See Service List



cc: Judge Helen F. Hoyt Judge Jerry Harbour Judge Richard F. Cole Judge Christine N. Kohl Judge Gary J. Edles Judge Reginald L. Gotchy Troy B. Conner, Jr., Esq. Ann P. Hodgdon, Esq. Mr. Frank R. Romano Mr. Robert L. Anthony Ms. Phyllis Zitzer Charles W. Elliott, Esy. 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 James Wiggins Timothy R. S. Campbell