TOLEDO EDISON

EDISON PLAZA 300 MADISON AVENUE TOLEDO GHID 43652-0001

AB-92-049 NP-33-92-007

Docket No. 50-346

License No. NPF-3

October 2, 1992

United States Nuclear Regulatory Commission Document Control Desk Washington, D. C. 20555

Gentlemen:

LER 92-007

Davis-Besse Nuclear Power Station, Unit No. 1

Date of Occurrence - September 6, 1992

Enclosed please find Licensee Event Report 92-007, which is being submitted to provide 3G days written notification of the subject occurrence. This LER is being submitted in accordance with 10 CFR 50.73(a)(2)(i).

Very truly yours,

Louis F. Storz

Plant Manager

Davis-Besse Nuclear Power Station

LFS/ed

Enclosure

cc: Mr. A. Bert Davis
Regional Administrator
USNRC Region III

DB-1 NRC Sr. Residen: Inspector

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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THE INFORMATION COLLECTION REQUEST 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORD AND REPORTS MANAGEMENT BRANCH (P.830). U.S. NUCLEAF REGULATORY COMMISSION, WASHINGTON, DC 20558. AND TO THE PAPERWORK REDUCTION PROJECT (3150/0104). OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 2050.

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ABSTRACT ... mit to 1400 souces i.e. approximately fifteen single-speck typewritten imes) (16)

On September 6, 1992 with the plant in mode 1, it was discovered that control rod C-7 was not included in Table 4.2 of Surveillance Test (ST) DB-SC-03180, "Remote Shutdown, Post Accident Monitoring Instrumentation Monthly Channel Check." A review indicated that control rod C-7 was not in Table 4.2 during the July and August, 1992 performances of the ST. As a result, Technical Specification surveillance 4.3.3.5 was not performed in July and August, 1992 for the monthly channel check of the control rod C-7 position switch.

On July 9, 1992, while processing a Temporary Approval procedure change to DB-SC-03180, the requirement to perform a channel check of control rod C-7 was unintentionally deleted and the omission was not identified during the review process.

Surveillance Test DB-SC-03180 was performed on September 6, 1992 and included verification of control rod C-7 position at the remote panel. DB-SC-03180 was changed to re-include control rod C-7 in Table 4.2. The Word Processing guidelines have been changed and NG-PS-00115, "Control of Procedures," will be revised by December 14, 1992. A review of a representative sample of STs with word processed Temporary Approvals since January 1, 1991 revealed no additional missed pagination errors.

NRC FORM 366A (6-89)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104 EXPIRES 4/30/92

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO USWPLY WITH THIS INFORMATION COLLECTION REQUEST 50.0 HRS FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (PS.01). US NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20658, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104). OFFICE OF MANAGEMENT AND BUDGET WASHINGTON, DC 20603.

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Description of Occurrence:

On September 6, 1992 at 1217 with the plant in Mode 1, it was discovered that control rod C-7 was omitted from Table 4.2 of Surveillance Test (ST) DB-SC-03180, "Remote Shutdown, Post Accident Monitoring Instrumentation Monthly Channel Check." The purpose of the test is to compare the position indications on the remote shutdown panel and control room panel for each control rod. Surveillance Test DB-SC-03180 satisfies the monthly channel check for Technical Specification (TS) 4.3.3.5.

A review indicated that the reference to control rod C-7 was included in Table 4.2 in the June, 1992 performance of the ST, but had been removed prior to the July and August, 1992 performances. Subsequently, TS surveillance 4.3.3.5 for the monthly channel check of the control rod C-7 position switch was not performed in July and August, 1992.

The missed channel checks for control rod C-7 are being reported in accordance with 10 CFR 50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.

Apparent Cause of Occurrence:

An investigation of this event determined that on July 9, 1992 while incorporating a Temporary Approval (TA) procedure change to DB-SC-03180 not involving control rod C-7, the Word Processing operator inadvertently deleted reference to control rod C-7 from the bottom of Table 4.2. The error was not identified by the Word Processing Department, Procedure Sponsor, Qualified Reviewer, or Validator. The procedure change process, as described in NG-PS-00115, "Control of Procedures," requires the Qualified and Cross Comment teviewers to "verify the functional and technical accuracy of the changed material" for Temporary Approvals. Since control rod C-7 was not part of the affected change, its absence from Table 4.2 was not recognized. The cause of this event appears to be a combination of a deficiency in the procedure review process (NG-PS-00115) and, to a lesser degree, inattention to detail by personnel involved with the procedure change.

The absence of control rod C-7 from Table 4.2 was not identified during the performance of DB-SC-03180 during July and August, 1992 because the control rod indications on the remote panel are not in the same order as on Table 4.2. The remote Position Reference Panel control rod position indicators (Control Rod Drive System Logic Cabinet 4, C4801U) are mounted by mechanism number and appear to be in no prescribed order to the operators. Since all control rods are not at the same position during power operation, the remote panel is a random array of illuminated and unilluminated position lamps. Consequently, since the operators recorded control rod positions in the order listed on Table 4.2 during the STs, it was not obvious upon completion of Table 4.2 that a control rod was omitted.

APPROVED OMB NO 3150-0104 EXPIRES 4/30/92

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEM. IT BRANCH (P-630). U.S. NUCLEAR REGULATORY COMMISSION. WASHINGTON, DC 20565, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104). OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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Analysis of Occurrence:

Technical Specification 3.3.3.5 "Remote Shutdown Instrumentation" specifies the required remote shutdown instrumentation necessary to bring the station to a safe shutdown condition if control room habitability is lost. In order to ensure compliance with this TS, Surveillance Requirement 4.3.3.5 requires, in part, a monthly channel check of the control rod position switches. The control rod position switches provide remote indication of rod positions following a most of control room habitability event. The positive comparison of the remote indication of control rod C-7 with the control room indication of control rod C-7 in the June and September, 1992 performances of DB-SC-03180, in combination with the fact that no maintenance was performed on the control rod C-7 circuitry or lamps, confirms that the switch for remote indication of control rod C-7 was operable during July and August, 1992.

Since positive evidence exists that the position switch for control rod C-7 was functional before, during, and after the July and August, 1992 performances of DB-SC-03180, the remote shutdown indication for control rod C-7 was available to provide its design function and this event has no safety significance.

Corrective Actions:

Surveillance Test DB-SC-03180 was performed satisfactorily on September 6, 1992 and included verification of control rod C-7 position at the remote panel.

DB-SC-03180 was changed on September 8, 1992 to return control rod C-7 to Table 4.2. A review of a representative sample of STs with word processed Temporary Approvals revealed no additional missed pagination errors.

The review process governing procedure, NG-PS-00115, will be changed by December 14, 1992 to include a review to ensure information on any altered page of a Procedure Change or Temporary Approval had not been erroneously deleted or adversely affected. A change to the review process for procedure Revisions is not necessary since NG-PS-00115 requires a review of the entire procedure being revised.

In the interim, Word Processing Guidelines have been revised to require printing the page following any red pages. This action will enable Word Processing personnel and procedure parers to identify when the bottom text of a page overflows to the ensuing page. In addition, as a lesson learned, Systems and Procedures Department management has distributed a memorandum to site procedure sponsors describing this event.

Failure Data:

A review of License Event Reports (LER) disclosed no similar events.

NP 33-92-07

PCAOR 92-0361