

g. Violation (50-416/85-09-07), Failure to follow procedure, by performing steps out of sequence resulting in an actuation of an ESF Containment isolation valve (paragraph 5).

3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Unresolved Items

Unresolved Items were not identified during this inspection.

5. Operational Safety Verification (71707)

The inspectors kept themselves informed on a daily basis of the overall plant status and any significant safety matters related to plant operations. Daily discussions were held with plant management and various members of the plant operating staff.

The inspector made frequent visits to the control room such that it was visited at least daily when an inspector was on site. Observations included instrument readings, set points and recordings; status of operating systems; tags and clearances on equipment controls and switches; annunciator alarms; adherence to limiting conditions for operation; temporary alterations in effect; daily journals and data sheet entries; control room manning; and access controls. This inspection activity included numerous informal discussions with operators and their supervisors.

Weekly, when onsite, a selected ESF system is confirmed operable. The confirmation is made by verifying the following: Accessible valve flow path alignment; power supply breaker and fuse status; major component leakage, lubrication, cooling and general condition; and instrumentation.

General plant tours were conducted on at least a biweekly basis. Portions of the control building, turbine building, auxiliary building and outside areas were visited. Observations included safety-related tagout verifications; shift turnover; sampling program; housekeeping and general plant conditions; fire protection equipment; control of activities in progress; radiation protection controls; physical security; problem identification systems; and containment isolation.

At 9:18 a.m. CST, on February 23, 1985, with the unit in cold shutdown, technicians were placing the Division 2 battery chargers on equalize per surveillance procedure 06-EL-1L21-0-0001, to charge the battery banks in preparation for a battery discharge test. The chargers are adjusted by turning a potentiometer until voltage of approximately 140 VDC is observed. One charger had been adjusted to 140 VDC and while adjusting the second charger, the inverter tripped on a high voltage of 147 VDC. This caused a loss of power to Division 2 reactor level instruments and the instruments failed low on a loss of power, thus indicating a reactor low water level signal. After the inverter tripped, technicians returned the equalizing voltage back to the normal float value of 132 VDC. The inverter automatically reset and restored power. A relay powered from the inverter energized before the level instrumentation could recover causing the ESF systems to initiate on an erroneous reactor water level signal. The ESF actuation raised the

B506270868 B50507
PDR ADOC 05000416
PDR
Q

06-EL-1L11-Q-001,	Rev. 24	Surveillance procedure, 125-volt Battery Bank All Cell Check
06-EL-1L11-R-001,	Rev. 22	Surveillance procedure, 125-volt Battery Bank Physical Condition Check
06-EL-1L51-R-001,	Rev. 21	Surveillance procedure, 125-volt Battery 1A3, 1B3, 1C3 Capacity Discharge Test
06-EL-1L21-0-001,	Rev. 22	Surveillance procedure, Battery 1A3, 1B3, 1C3 Capacity Discharge Test.
C & D Batteries Division Eltra Corp.		Installation and Operating Instructions for Stationary Batteries
C & D Auto Reg. Charger Eltra Corp.		Installation and Operating Instruction Manual.

The Inspector found the following discrepancies:

- a. The criteria in procedure 06-EL-1L21-0-001 are incomplete. Technical Specification (TS) 4.8.2.1.f, in part requires an annual capacity discharge test if any battery has reached 85% of the service life expected for the application or if capacity drops more than 10% of rated capacity from its average on previous performance tests. These criteria are not imposed in this or any other procedure.
- b. Procedure 06-EL-1L11-Q-001 has a statement that the 72-hour equalizing charge may be omitted if maintenance engineering has determined that an equalizing charge is not needed at this time. The procedure does not reference the corrective action guidelines of paragraph 3.4 of IEEE Std. 450-1975 which defines criteria for when an equalizing charge is required. The statement was just recently added to the procedure and the licensee has routinely been accomplishing the 72-hour equalizing charge every quarter.

The licensee is revising their procedures to correct the above discrepancies. This will be tracked as an Inspector Followup Item (50-416/85-09-02).

8. ESF System Walkdown (71710)

A complete walkdown was conducted on the accessible portions of the control room atmospheric control and isolation system. The walkdown consisted of an inspection and verification, where possible, of the required system valve alignment, including valve power available and valve locking, where required; instrumentation valved in and functioning; electrical and instrumentation cabinets free from debris, loose materials, jumpers and evidence of rodents; and system free from other degrading conditions.

In the areas inspected, no violations or deviations were identified.

9. Reportable Occurrences (90712 & 92700)

The below listed Licensee Event Reports (LERs) were reviewed to determine if the information provided met NRC reporting requirements. The determination included adequacy of event description and corrective action taken or planned, existence of potential generic problems, and the relative safety significance of each event. Additional inplant reviews and discussions with plant personnel, as appropriate, were conducted for the reports indicated by an asterisk. The LERs were reviewed using the guidance of the general policy and procedure for NRC enforcement actions. The following LERs are closed.

<u>LER No.</u>	<u>Report Date</u>	<u>Event</u>
*85-009	March 15, 1985	Inadvertent Emergency Core Cooling System (ECCS) actuation and reactor scram while shutdown.
84-054	December 20, 1984	Chemistry surveillances on effluent cumulative dose calculations performed one day late.
85-006	March 7, 1985	Spurious Residual Heat Removal (RHR) equipment area high temperature signal surveillance not performed
85-005	February 28, 1985	Surveillance not performed within time limit
84-061	January 28, 1985	Fire watch not performed due to disabled door.
84-051	December 3, 1984	Reactor Core Isolation Cooling (RCIC) isolation on high steam flow signal.
83-174	November 28, 1983	Division II diesel generator fuel oil leak.

The event of LER 85-009 was discussed in Inspection Report 85-06 and is being tracked as violation 50-416/85-06-01. Similar events of LER 84-051 were discussed in Inspection Report 85-03 and licensee actions are being tracked as inspector followup item 50-416/85-03-04. LER 84-45 and LER 85-008 both remain open. Both LERs address a problem with the precoat filters isolating and resulting in a reactor scram on loss of instrument air. LER 84-45 was previously discussed in report 84-49 as part of scram No. 8. The event of LER 85-008 is discussed in paragraph 10 of this report in scram number 20.

In the areas inspected, no violations or deviations were identified.