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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104 EXPIRES: 8/31/85

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At 1337 CDT on 5/29/85 Unit Vent Wide Range Gas Monitor GT-RE-21B (IEEE Standard 805-1983 System - VL, IEEE Standard 803A-1983 Component - MON) was declared inoperable due to an internal flow control valve problem on the monitor's low range pump. A faulty diaphragm was replaced on the pump and the monitor was declared operable at 1739 that same day.

At 2238 on 6/7/85 a Reactor Trip occurred due to a high negative flux rate trip (refer to LER 85-026-00 dated 6/28/85). In accordance with Technical Specification (T/S) 3.11.2.1, Table 4.11-2, Footnote 3, "Sampling and analysis shall also be performed following shutdown, startup, or a THERMAL POWER change exceeding 15% of RATED THERMAL POWER within 1 hour period", a grab sample of Unit Vent gaseous concentration was taken using a portable sampling cart. In addition, Footnote 7 of the same T/S requires "...for unit vent, sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, STARTUP or THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period..." Samples were taken from 6/7/85 to 6/15/85 using GT-RE-21B as the sampling monitor.

At 0150 on 6/11/85 it was discovered during an inspection of the monitor that a sample line on GT-RE-21B had been disconnected from the suction of the sample pump (refer to Figure 1). It was later determined that this sample line had been disconnected for the maintenance activities on 5/29/85, as described above, and was not reconnected due to a personnel error. The sample line was reconnected promptly upon discovery. The plant was in Mode 1 (Power Operation) at 99% power upon discovery of the event.

During the period from 6/7/85 (Reactor Trip) to 6/15/85 GT-RE-21B was used to obtain the samples required by T/S 3.11.2.1. The sample required by T/S 3.11.2.1, Table 4.11-2, Footnote 3 was taken using a portable sampling cart which was tapped into the sample line as shown in Figure 1. The portable sampling cart is equipped with its own pump which was used to obtain this sample of Unit Vent gaseous concentration, thus this sample is valid. The samples required by Table 4.11-2, Footnote 7 were taken with the pump on GT-RE-21B for 4 days prior to the discovery of the disconnected sample line on 6/11/85 and are thus considered invalid. The remaining 3 samples required by Footnote 7 were taken after the sample line was reconnected to the pump and are valid. GT-RE-21B was not used for any other sampling activities during the period from 5/29/85 to 6/11/85.

NRC Form 366A

NRC Form 366A (9-83)	LICENSEE EVENT REPO	RT (LER) TEXT CONTINU	OITAU	N	U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES 8/31/85							
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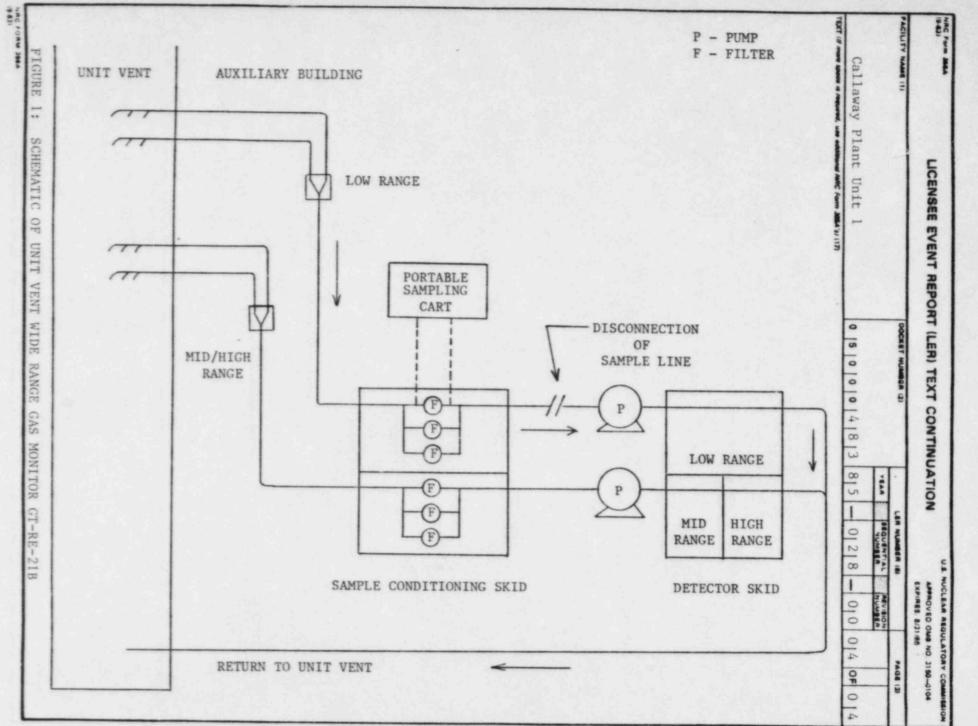
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Also as a result of this monitor's inoperability from 5/29/85 to 6/11/85, two additional Technical Specifications were violated. T/S 3.3.3.6.c requires that "With the number of OPERABLE channels for the containment radiation level monitor or the unit vent - high range noble gas monitor less than the Minimum Channels OPERABLE requirements of Table 3.3-10, initiate the preplanned alternate method of monitoring the appropriate parameter(s) within 72 hours and either restore the inoperable channel to OPERABLE status within 7 days, or prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days ... " The preplanned alternate method of monitoring the appropriate parameter(s) was not initiated within 72 hours, thus violating the first part of this ACTION. However, OPERABILITY was restored immediately upon discovery of the disconnected sample line, thereby satisfying the second part of this ACTION. Furthermore, T/S 3.3.3.10.b, Table 3.3-13, Action 40 states, "With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided grab samples are taken at least once per 12 hours and these samples are analyzed for radioactivity within 24 hours." Grab samples were not taken during the inoperability of GT-RE-21B thus violating this T/S.

To prevent recurrence of personnel errors that disable equipment, I&C technicians have been reinstructed to review steps taken during maintenance activities. This review at the conclusion of the maintenance activity will be made to ensure equipment is returned to its normal configuration. This incident has also been reviewed with Health Physics technicians; the need to be observant of abnormal operating conditions associated with the Wide Range Gas Monitor was emphasized.

Despite the inoperability of GT-RE-21B, effluent accountability was not compromised. Routine sampling of the Unit Vent is performed using sampling points associated with the Unit Vent Particulate and Iodine Monitor GT-RE-21A (IEEE Standard 805-1983 System - VL, IEEE Standard 803A-1983 Component - MON) in accordance with approved procedures. These samples, performed in accordance with T/S 3.11.2.1, were utilized, as described in the OFFSITE DOSE CALCULATION MANUAL, to ensure that the gaseous effluent release limits of T/S 3.11.2.2 and 3.11.2.3 were not exceeded. In no way has this incident affected the health or safety of the public.

Previous occurrences: None.



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UNION ELECTRIC COMPANY

MAILING ADDRESS: P.O.BOX 149 ST. LOUIS, MO. 63166

July 11, 1985

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

ULNRC-1136

Gentlemen:

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DOCKET NUMBER 50-483 CALLAWAY PLANT UNIT 1 FACILITY OPERATING LICENSE NPF-30 LICENSEE EVENT REPORT 85-028-00 TECHNICAL SPECIFICATION VIOLATION

The enclosed Licensee Event Report is submitted pursuant to 10 CFR 50.73(a)(2)(i) concerning the inoperability of the Unit Vent Wide Range Gas Monitor.

andnew P. Neuhalfer

S. E. Miltenberger Manager, Callaway Plant

CDN/WRR/JMK/gjt Enclosure

cc: Distribution attached

## cc distribution for ULNRC-1136

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NRC Resident Inspector D. F. Schnell J. F. McLaughlin J. E. Davis (Z40LER) D. W. Capone/R. P. Wendling F. D. Field R. L. Powers A. C. Passwater/D. E. Shafer/D. J. Walker G. A. Hughes W. R. Robinson (QA Record) J. M. Price C. D. Naslund J. R. Peevy R. A. McAleenan L. K. Robertson (470) (NSRB) Merlin Williams, Wolf Creek SEM Chrono 3456-0021.6 3456-0260 Z40ULNRC G56.37 N. Date