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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

US NUCLEAR REGULATORY COMMISSION

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I. EVENT DESCRIPTION

RC Form 386A

At 0220 hours on February 18, 1986, the Unit 1 Reactor Water Cleanup (RWCU, CE) filter/demin system was taken out of service. As a consequence of this action, flow at sample panel (KN) (1PL14J) ceased. The Reactor Recirculation system (AD) was also shut down during this time and had an outstanding Work Request to clear a plugged sample line. With both of these sample points inoperable, the continuous conductivity monitor (KN) became inoperable.

Although not realizing that the monitor was inoperable, the Chemistry group obtained a dip sample of the Unit 1 Reactor Vessel (AD) at 1400 hours on February 19, 1986. This was done to avoid exceeding the once per 72 hour sampling and analysis requirements of Technical Specifications 4.4.4.b.1.a, 4.4.4.b.2 and 4.4.4.b.3.a. The conductivity of this sample was 2.5 umho/cm so sampling was initiated on a once per 4 hour frequency until 0900 hours on February 28, 1986 (to meet fuel warranty requirements), at which time the frequency became once per 8 hours to meet the requirements of Technical Specifications 4.4.4.b.1.b and 4.4.4.b.3.b. This continued until the monitor was declared operable and the conductivity was restored to a value less than 1.0 umho/cm at 1121 hours on March 4, 1986, and 0810 hours on March 3, 1986, respectively.

During a routine weekly review of LAP-1800-4, "Rad Chem Surveillance", the Rad Chem Supervisor realized that not obtaining a sample between 0220 hours on February 18, 1986, and 1400 hours on February 19, 1986, exceeded the 24-hour time period allowed by Technical Specification 4.4.4.c.2.

Failure to perform the surveillance is a violation of Technical Specification 4.4.4.c.2.

II. CAUSE

The principle cause of this event can be attributed to personnel error. Rad Chem and Operating personnel were not aware of the correct Technical Specification condition that existed at the time of the event. In an effort to meet the 72-hour sampling requirements of Technical Specification 4.4.4.b.1.a, 4.4.4.b.2 and 4.4.4.b.3.a, the more restrictive requirement of Technical Specification 4.4.4.c.2 (performing a conductivity measurement once per 24 hours when the continuous conductivity monitor is inoperable for up to 31 days) was overlooked.

Contributing causes were inadequate training on Technical Specification sampling requirements and procedural inadequacies.

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US NUCLEAR REGULATORY COMMISSION

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III. PROBABLE CONSEQUENCES OF THE OCCURRENCE

The reactor was defueled with the reactor cavity open to the atmosphere. Samples of reactor water obtained prior to the event (0915 hours on February 17, 1986) and those obtained after the event (beginning 1400 hours on February 19, 1986) were analyzed and within the limits of Technical Specification Table 3.4.4-1.

The event had no impact on plant safety, as indicated by the samples obtained prior to and after the event.

Because the primary cause was a misunderstanding of the proper surveillance frequency, this event could have occurred with fuel in the vessel; however, this is very unlikely since at least one sample point would normally be available. The consequences would depend upon the actual chemical environment in the vessel. If, as in the case of the event, samples obtained before and after the event showed all parameters to be within the limits of Technical Specification Table 3.4.4-1, it could be concluded that there were no adverse consequences.

IV. CORRECTIVE ACTIONS

- Reactor coolant samples have been obtained and analyzed for conductivity within the specified sample frequency since 1400 hours on February 19, 1986.
- b. The Radiation Chemistry Technicians have been retrained to understand the sampling requirements of the Technical Specifications and the proper completion of the Attachments to LAP-1800-4, "Rad Chem Surveillance".
- c. The Radiation Protection Foremen have been retrained to understand the sampling requirements of the Technical Specifications and the requirements for review of the Attachments to LAP-1800-4. Upon completion of this retraining the radiation protection Foremen will initiate review of these attachments (sampling requirements) shiftly.
- d. Chemistry Management will be retrained to understand the sampling requirements of the Technical Specifications, verify that they have been met and provide a detailed turnover of non-routine sampling requirements to the offshift radiation protection Foremen should unusual conditions exist.

e. The laboratory Foreman was reprimanded, upon his return to the Station, on March 3, 1986.

NRC Form 286A

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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IV. CORRECTIVE ACTIONS (Continued)

AC Form 2844

- f. The Shift Foreman was counseled upon his return to the Station March 5, 1986.
- g. LOP-RT-03, "Reactor Water Cleanup System (RWCU) Shutdown", was revised to include a note to inform the Radiation Chemistry Department when the Reactor Water Cleanup system is shut down.
- h. LOS-AA-D1, "Daily Surveillance", was revised to accurately indicate that the surveillance for an inoperable continuous conductivity monitor is applicable at all times.
- i. LAP-1800-4, "Rad Chem Surveillance", has been revised to accurately indicate that the surveillance for an inoperable continuous conductivity monitor is applicable at all times.
- j. Tailgates on this event are being held with the Operating and Radiation Chemistry Departments. The Rad Chem portion of these tailgates has been completed. This training for Operating personnel is being tracked by AIR 374-200-86-02400.
- k. Monday through Friday when Chemists are on-site a Chemist will review the surveillance schedule daily along with the Laboratory Foreman.
- 1. This event was discussed at a March 5, 1986, meeting with all Station Department Heads.
- m. LAP-1800-6, "Rad Chem Foreman Shift Turnover" is being revised to require the Rad Chem Shift Foreman to review the Technical Specification sample sheet in the laboratory area on a shiftly basis. This revision will be tracked by AIR 374-200-86-02401.

V. PREVIOUS OCCURRENCES

Previous missed samples are documented in the following LER's:

373/82-011/03L-0 373/82-041/03L-0 373/84-027-00 373/84-048-00 374/84-019-00 374/84-053-00 373/85-018-00 373/85-018-00 373/85-047-01 374/85-004-00 374/85-020-00 374/85-048-00 373/86-003-00

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James A. Schuster, Chemist, 815/357-6761, extension 306.



Commonwealth Edison LaSalle County Nuclear Station Rural Route #1, Box 220 Marseilles, Illinois 61341 Telephone 815/357-6761

March 18, 1986

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

Dear Sir:

Reportable Occurrence Report #86-006-00, Docket #050-373 is being submitted to your office in accordance with 10CFR 50.73.

for G. J. Diederich

G. J. Diederich Station Manager LaSalle County Station

GJD/DRR/kg

Enclosure

xc: NRC, Regional Director INPO-Records Center File/NRC