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ComEd

April 14, 1997

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

Licensee Event Report #97-013-00, Docket #050-373 is being submitted to your office in accordance with 10 CFR 50.73(a)(2)(i).

Respectfully,

Fred Dacimo
Plant General Manager
LaSalle County Station

Enclosure

cc: A. B. Beach, NRC Region III Administrator
M. P. Huber, NRC Senior Resident Inspector - LaSalle
C. H. Mathews, iDNS Resident Inspector - LaSalle
F. Niziolek, IDNS Senior Reactor Analyst
INPO - Records Center

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NRC FORM 366 (5-92) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 05/31/95

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1):	DOCKET NUMBER (2)	PAGE (3)
LaSalle County Station Unit One	05000373	1 of 4

TITLE (4) Misinterpretation of Technical Specifications Resulted in Failure to Perform the Isolation Valve Surveillance For All Transversing Incore Probes

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
									LaSalle County Station Unit Two	05000374
03	20	97	97	013	00	04	14	97	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	4
POWER LEVEL (10)	000

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

☐ 20.2201(b)	☐ 20.2203(a)(3)(i)	☐ 50.73(a)(2)(iii)	☐ 73.71(b)
☐ 20.2203(a)(1)	☐ 20.2003(a)(3)(ii)	☐ 50.73(a)(2)(iv)	☐ 73.71(c)
☐ 20.2203(a)(2)(i)	☐ 20.2003(a)(4)	☐ 50.73(a)(2)(v)	☐ OTHER
☐ 20.2203(a)(2)(ii)	☐ 50.36(c)(1)	☐ 50.73(a)(2)(vii)	
☐ 20.2203(a)(2)(iii)	☐ 50.36(c)(2)	☐ 50.73(a)(2)(viii)(A)	(Specify in Abstract
☐ 20.2203(a)(2)(iv)	☒ 50.73(a)(2)(i)	☐ 50.73(a)(2)(viii)(B)	below and in Text,
☐ 20.2003(a)(2)(v)	☐ 50.73(a)(2)(ii)	☐ 50.73(a)(2)(x)	NRC Form 366A)

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
W. Steffes, Staff Assistant	(815) 357-6761 Extension 2992

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
☐ YES (If yes, complete EXPECTED SUBMISSION DATE)	☒ NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines 16)

On March 20, 1997 the Primary Containment Isolation (PCIS) System Functional Performance Review Team (SFPR) identified a concern regarding LaSalle Electrical Surveillance LES-PC-107(207), Unit 1(2) Group 7 Isolation Logic System Functional Test. The concern was whether the testing methodology used in this procedure met the surveillance requirements of Technical Specification 4.3.2.2. Technical Specification 4.3.2.2, Logic System Functional Test, shall be performed at least once per 18 months, this includes the actuated device to verify operability. Contrary to this requirement LES-PC-107, and LES-PC-207, Unit 1/2, Primary Containment Isolation System (PCIS) Functional Test did not check the actuated device on all 5 TIP machines. This condition has existed since initial plant licensing.

This condition appears to have been caused by misinterpretation of Technical Specification surveillance requirement 4.3.2.2.

Corrective actions include revising the procedures to check all five TIP machines and testing the system per the revised surveillance procedures prior to start-up of either unit.

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor

Energy Industry Identification System (EIIS) codes are identified in the text as [XX].

A. CONDITION PRIOR TO EVENT

Unit(s): 1/2 Event Date: 03/20/97 Event Time: 1200 Hours
Reactor Mode(s): 4/N Mode(s) Name: Cold Shutdown/Defueled Power Level(s): 0%/0%

B. DESCRIPTION OF EVENT

On March 20, 1997, the Primary Containment Isolation (PCIS) System Functional Performance Review Team (SFPR) identified a concern regarding LaSalle Electrical Surveillance LES-PC-107(207), Unit 1(2) Group 7 Isolation Logic System Functional Test. The concern was whether the testing methodology used in this procedure met the surveillance requirements of Technical Specification 4.3.2.2. Technical Specification 4.3.2.2 requires a logic system functional test and simulated automatic operation of all channels listed in Table 3.3.2-1 (isolation actuation instrumentation) every eighteen months. A logic system functional test, as described in the Technical Specification Definitions, requires a test of all logic components, (i.e. all relays and contacts, all trip units, solid state logic elements, etc.) of a logic circuit, from sensor through and including the actuated device to verify operability. During the review of LES-PC-107(207) for the Traversing Incore Probe (TIP) [IG] portion of the PCIS Group 7 logic, it was determined that the surveillance only required one TIP (of a total of five machines) to be inserted and withdrawn. This does not meet the definition for a logic system functional test, since the automatic withdrawal function of all machines is not tested. Further review determined there is no other LaSalle surveillance which functionally tests the PCIS Group 7 automatic withdrawal function of all five TIP machines every eighteen months.

The Unit 1 TIP system has been Out-of-Service (OOS) since September 25, 1996 to support the Unit 1 forced outage. The Unit 2 TIP system has been OOS since September 19, 1996, to support the Unit 2 refueling outage. Both units are currently shutdown and have been shutdown since September of 1996.

This event is reportable per 10 CFR 50.73 (a)(2)(i)(B) due to a deviation from Technical Specification Surveillance requirement 4.3.2.2.

C. CAUSE OF EVENT

The cause of this event was a misinterpretation of Technical Specification surveillance requirement 4.3.2.2. The control logic is tested per the requirement, and one TIP is inserted into the indexer to test the automatic TIP withdraw function. All five TIP machines withdraw via the same PCIS signal. It was assumed that since all TIPs withdraw from the same signal, (same relay contacts) the testing of one TIP was sufficient to test the logic for all TIPs. A review was performed of all revisions of LES-PC-107(207), from revision 0 to the present revision (5) and all revisions are written to insert and withdraw only one TIP.

D. ASSESSMENT OF SAFETY CONSEQUENCES

The safety consequences of this event are minimal. The TIP system has a design feature which mitigates the consequences of a failure of a TIP to withdraw. Each TIP guide tube ball valve assembly is provided with a manually operated shear valve. The shear valve is equipped with an explosive squib. When manually detonated, the shear valve will cut the TIP cable and close off the guide tube. Upon receipt of a valid isolation signal during TIP system operation, the operator is directed by LOP-NR-06, TIP Operation, to verify TIP withdrawal and ball valve closure. If a TIP detector fails to withdraw, the operator is directed to manually withdraw the detector or actuate the associated shear valve.

E. CORRECTIVE ACTIONS

1. LES-PC-107(207) will be revised to meet the requirements of Technical Specification 4.3.2.2.

2. The revised procedure will be performed prior to entering operational conditions 1, 2, or 3, when the isolation actuation instrumentation is required to be operable. The performance of LES-PC-107 is being tracked by Degraded Equipment Log (DEL) entry #227-96-1-140 for Unit 1, and LES-PC-207 for Unit 2 (DEL) #136-95-2-154, to ensure it is performed prior to each unit restart.

Other activities to improve plant performance with respect to the design and licensing bases are:

System Functional Reviews

These reviews were initiated to establish a level of confidence that selected systems demonstrate performance consistent with the design basis. An element of these reviews is to identify required system functions and sub-functions as described in design bases documents, including the Technical Specifications. Surveillance testing requirements, procedures, and other test documentation are then reviewed to confirm that system functionality is demonstrated. Any inconsistencies identified among the source documents are being documented and tracked to resolution. These reviews are being implemented with applicable corrective actions completed prior to each unit restart.

UFSAR Validation

To ensure the integrity of the UFSAR, a verification and validation of the regulatory design basis information contained in the UFSAR is being performed. This includes a review of the UFSAR, the Technical Specifications, and other applicable documents and plant procedures.

F. PREVIOUS OCCURRENCES

LER NUMBER	TITLE
373-96-015	Misinterpretation of Technical Specification Surveillance Results in Inoperable Diesel Driven Fire Suppression Pumps.
373-97-006	Diesel Generator Testing Did Not Meet Surveillance Requirements Due to Misinterpretation of Technical Specification.

The corrective actions discussed in LER 373-96-015 Revision 01 included implementation of the System Functional Review Program. The event being reported in the subject report (373-180-97-013LER) and (373-97-006) both were discovered by implementation of the System Functional Review Program. This is evidence of the effectiveness of the corrective actions being taken as a result of the LER 373-96-015 event. Therefore, this event is not an indication of inadequate corrective action for the previous occurrence.

G. COMPONENT FAILURE DATA

Since no component failure occurred, this section is not applicable.