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On January 18, 1986 at approximately 1400 hours while the unit was at 93% power a surveillance procedure was performed that caused a violation of the minimum degree of redundancy for the containment pressure Engineered Safety Feature Actuation channels. The pressure channels were rendered inoperable when the pressure transmitters were isolated from containment as part of the test.

The inoperability resulted from cycling of the pressure transmitter manual isolation values as per the direction of procedure PT-2.10.6 "Containment Pressure Transmitters Manual Isolation Value Stroking". This procedure is only intended to be used at Cold or Refueling shutdown. However, the requirement for the plant to be in a Cold/Refueling condition for performance of PT-2.10.6 or proper defeat of the channels being isolated were not identified. PT-2.10.6 does not state Cold or Refueling Shutdown as an initial condition.

On January 18, 1986 a Results and Test Technician, after notifying the Shift Supervisor and Head Control Operator, proceeded to perform PT-2.10.6. The test involved stroking closed then immediately opening each of the containment pressure transmitter manual isolation valves, one at a time.

The resulting isolation of the transmitter rendered it inoperable. Only one transmitter was done at a time and each was isolated for only a short time (< 10 sec.). This resulted in not meeting the minimum degree of redundancy as per R.E. Ginna Technical Specification Section 3.5.3.1 and Table 3.5-2. ESF actuation signals for the Safety Injection, Containment Spray and Main Steam Isolation Systems were potentially compromised during the duration of the test.

On January 18, 1986 during a review of the completed PT-2.10.6 procedure a Q.C. Technician identified a possible conflict between the procedure initial conditions and Appendix C of the RG&E QA Manual. The Q.C. Technician generated a QC Surveillance report to document the conflict.

NRC Form 366A (9-83)	LICENSEE EVENT RE	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION							APPROVED OM8 NO 3150-0104 EXPIRES 8/31/85					
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On January 21, 1986 during a review of the completed PT-2.10.6 procedure and a Quality Control Surveillance report generated after the performance of the test, the Results and Test Supervisor reported the error to plant management after reviewing a reference to the RG&E QA Manual Appendix C contained in the procedure. The QA Manual states that these valves cannot be stroked during normal plant operation to prevent inoperability of the containment Further review determined that this was pressure transmitters. also a violation of Technical Specifications.

Review of this event has determined that parts of the Containment Spray, Safety Injection and Main Steam Isolation Actuation signals were potentially compromised. However, due to the short duration of the test the safety significance is minor. Actuation signal for these systems which do not use containment pressure were not affected.

The following corrective actions have been performed or are planned.

- 1. Change PT-2.10.6 to reflect the requirement for the plant to be in Cold or Refueling Shutdown or proper defeat of isolated channels.
- Ensure other procedures in the PT-2.10 series contain the 2. correct initial conditions.
- 3. Clarify notes in Append x C to the QA Manual which state "Refueling Outages" an make no mention of "Refueling" as it is defined in Technical Specifications. Also add that this test can be performed at power if the proper precautions are taken.





ROCHESTER GAS AND ELECTRIC CORPORATION . 89 EAST AVENUE, ROCHES ER, N.Y. 14649-0001

ROGER W. KOBER VICE PRESIDENT ELECTRIC & STEAM PRODUCTION

TELEPHONE AREA CODE TIL 546-2700

February 17, 1986

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

Subject: LER 86-001, Failure to Meet Minimum Degree of Redundancy for Engineered Safety Features Actuation System R.E. Ginna Nuclear Power Plant Docket No. 50-244

In accordance with 10 CFR 50.73, Licensee Event Report System, item (a)(2)(i) which requests a report of, "any operation or condition prohibited by the plant Technical Specifications" the attached Licensee Event Report LER 86-001 is hereby submitted.

Very) truly yours,

Roger W. Kober

RWK/eeg

xc: U.S. Nuclear Regulatory Commission Region I 631 Park Avenue King of Prussia, PA 19406