NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

LICENSEE EVENT REPORT (LER)

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TITLE (4)

Failure to Perform Area Temperature Monitoring Due to an Inadequate Procedure

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 NAMES	DOCKET NUMBER(S)
1 1	1 8	8 7	8 7	-	0 3 0	-	0 1	0 8	3 0	8 8		0 5 0 0 0
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OPERATING MODE (9)	4	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)							
POWER LEVEL (10)	0 0 0		20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)
			20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)
			20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER (Specify in Abstract below and in Text, NRC Form 366A)
			20.405(a)(1)(iii)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		
			20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)		
			20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
	AREA CODE
L.A. England - Director-Nuclear Licensing	5 1 0 | 3 8 1 1 - 4 4 1 1 5

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)	X NO				

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

On 11/18/87, with the unit in Operational Condition 4 (Cold Shutdown), it was discovered that the surveillance requirement for Technical Specification 3.7.8 "Area Temperature Monitoring" had not been properly performed for the reactor plant component cooling water (RPCCW) system areas. The cause of the improperly performed surveillance has been attributed to an inadequate procedure. The surveillance procedure failed to specify the proper locations for monitoring the RPCCW area temperature. The omission from the surveillance procedure is considered to be related to multiple surveillances being conducted via a single procedure.

As corrective action, this and other multiple surveillance procedures were reviewed for omissions and the missed surveillances have been added to the applicable surveillance test procedures (STPs). An evaluation has concluded that it is very unlikely that the RPCCW area temperature limit has ever been exceeded. Therefore, there was no significant impact on the health and safety of the public as a result of this procedural omission.

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

Reported Condition

On 11/18/87, with the unit in Operational Condition 4 (Cold Shutdown), it was discovered that the surveillance requirement for River Bend Station Technical Specification 3.7.8 "Area Temperature Monitoring" had not been properly performed for the reactor plant component cooling water (RPCCW) system (*CC*) areas. Technical Specification Table 3.7.8-1 lists two items (Items 1.p and 1.r) as "RPCCW Area" with a temperature limit of 122 degrees F. The Technical Specification does not specify which areas of RPCCW are to be monitored; however, the applicable surveillance test procedures (STPs) only required one area to be monitored. Therefore, failure to perform this surveillance requirement constituted an operation prohibited by the River Bend Station Technical Specifications.

Investigation

As stated in the Bases for this Technical Specification, the area temperature limitations ensure that safety-related equipment will not be subjected to temperatures in excess of their environmental qualification temperatures. The two RPCCW areas required to be monitored by the Technical Specification are those areas that, due to the lack of redundant HVAC, may be susceptible to an "abnormal condition" temperature which is greater than the maximum normal temperature for which equipment in the area is qualified.

It was also determined that the one area of RPCCW being monitored for area temperatures (70 foot elevation) was not either of the areas intended by the Technical Specifications. The Technical Specifications intended to have the area temperatures on the 95 and 114 foot elevations of the auxiliary building monitored. Other areas being monitored were verified to be those consistent with the Technical Specification development documentation.

Investigation into the cause of the surveillance omission from the STP was inconclusive. However, the oversight was considered to be related to multiple Operations department surveillances being conducted via a single STP.

Review of five multiple Operations department surveillance procedures (STP-000-0001, "Daily Operating Logs," STP-000-0004, "Daily Cold Shutdown Logs," STP-000-0005, "Daily Refueling Logs," STP-000-0101, "Weekly Operating Logs," and STP-000-0201, "Monthly Operating Logs,") revealed one other omission. Technical Specification Table 4.3.7.11-1 lists a daily channel check and a monthly source check for the main plant (1RMS*RE125, -RE126), fuel building (1RMS*RE5A, 5B), and radwaste building (1RMS*RE6A, 6B) exhaust duct radioactive gaseous effluent monitoring instrumentation (*RM*). This table also lists a note (4) after each instrument identified. An explanation of the note is contained on Page

3/4 3-105 which states, "The Surveillance Requirements apply to all ranges of the monitoring equipment." Because 1RMS*RE125, 5A and 6A contain mid and high ranges, these surveillances must be performed on all the monitor's channels. However, contrary to the requirements, this surveillance notation was apparently overlooked during STP development and consequently, the surveillance requirements for the mid and high ranges for these wide range radiation monitors were not being performed. However, all ranges of these radiation monitors were calibrated and received a quarterly channel functional test in accordance with the Technical Specification. Only the daily channel check and monthly source check had been omitted from the STPs. In addition, the digital radiation monitoring system (DMRS) (*IL*) automatically conducts a source check on an eight hour frequency. Any source check failure would have been indicated when the operator selects the corresponding range. However, since the daily channel check was not being performed on all ranges, a source check failure may have gone unnoticed for the mid or high ranges. These surveillances were subsequently added to the appropriate STPs and were successfully performed on 12/11/87.

In order to determine what the actual temperatures were in the areas which were not being monitored as required, an evaluation was conducted. This evaluation was based upon a review of the maintenance work history and availability of the unit coolers servicing the subject areas, shiftly temperature histories of adjacent areas, and information on the design heat loads of the subject and adjacent areas. The heat loads on the 70 and 95 foot RPCCW elevations are serviced by unit cooler 1HVR*UC3. The largest of these heat loads is located on the 70 foot elevation. Because there is grating above this heat load through to the 114 foot elevation, and unit cooler 1HVR*UC3 is located on the 95 foot elevation, there should not be a significant difference between the area temperatures of the 70 and 95 foot elevations. The 114 foot elevation RPCCW area is open to and adjacent to the Motor Control Center (MCC)-west (*MCC*). Both of these areas are served by unit cooler 1HVR*UC7. Because each of these areas are open to each other and served by the same unit cooler, these areas are also expected to have relatively the same area temperatures. Additionally, the RPCCW area has a much smaller heat load than the MCC center. Again, there is grating between the 95 and 114 foot elevations of RPCCW. Therefore, there should not be a significant difference in the area temperatures between these two areas.

A review of historical area temperatures during the 1987 summer months of the 70 foot elevation RPCCW area and the 114 foot elevation MCC-west, shows that these areas have generally been the same temperature. The temperature limit of 112 degrees F for the MCC-west area has not been exceeded. Therefore, with the unit coolers in operation, it is concluded that, none of the areas not

previously monitored as required would have exceeded the 122 degrees F RPCCW area temperature limit. An evaluation after the unit returned to power operation during the warm summer months of 1988 concluded that this approach is still valid and provides adequate assurance that the temperature limits for the areas not monitored had not been exceeded.

In addition, a review of the maintenance history of unit coolers 1HVR*UC3 and 1HVR*UC7 has shown that only 1HVR*UC7 was out of service during maintenance for up to 5 hours. These unit coolers are designed to maintain these areas below the equipment qualification temperature limit of 122 degrees F with the equipment in the area in operation. In addition, based on a recent engineering evaluation of unit cooler performance, 1HVR*UC3 and 1HVR*UC7 have approximately 20 percent and 9 percent excess heat removal capacity, respectively. This provides added assurance that, with these unit coolers in operation during normal operating conditions, these unit coolers have been able to perform their intended functions. A review of Limiting Conditions of Operation (LCOs) showed that neither unit cooler was ever out of service during the first operating cycle. It is concluded that, except for possibly the 5 hours identified above, these unit coolers were always in operation during the first operating cycle. Therefore, the above evaluations have concluded that it is very unlikely that the RPCCW area temperature limit of 122 degrees F has been exceeded in the areas which were not previously being monitored as required.

A review of LERs previously submitted by River Bend Station revealed that LERs 86-066 and 87-026 reported missed surveillance on fire doors as a result of the doors not being listed on the appropriate STPs. No other instances of missed Technical Specification surveillances due to procedural omissions were identified.

Corrective Action

As corrective action, the intended RPCCW areas have been added to the applicable STPs. In addition, the STPs have been revised to include the surveillance requirements for the wide range radiation monitor surveillance deficiencies found during the STP review referenced above.

Safety Assessment

The results of the evaluations above have concluded that based on the unit coolers which are designed to maintain the temperatures below the limit having been in operation and with the historical data from adjacent areas generally supporting, it is very unlikely that the 122 degrees F temperature limit has ever been exceeded. Since the purpose of this area temperature surveillance requirement is to ensure that the equipment in the area is not subjected to

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temperatures in excess of their environmental qualification temperatures and the evaluation has concluded that it is unlikely this temperature limit has ever been exceeded, there was no significant impact on the health and safety of the public as a result of this procedural omission.

Since the surveillance requirements for the calibration and quarterly channel functional tests have been performed in accordance with the Technical Specifications for the wide range radiation monitors, daily channel checks and monthly source checks have been performed on the ranges in use at the time and the missed ranges were subsequently checked satisfactorily, there was also no significant impact on the health and safety of the public as a result of this procedural omission.

Note: Energy Industry Identification System Codes are identified in the text as (*XX*).

GULF STATES UTILITIES COMPANY

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

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458

Please find enclosed Licensee Event Report No. 87-030 Revision 1 for River Bend Station - Unit 1. This report is being submitted pursuant to 10CFR50.73 to provide the results of further evaluations.

Sincerely,

J. E. Booker

J. E. Booker
Manager-River Bend Oversight
River Bend Nuclear Group

JEB/TFP/PDG/DAS/ch

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