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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES #/31/85

FACILITY NAME (1)	DOCKET NUMBER (2)		L	ER NUMBER (6)	,	PAGE (3)		
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NRC Form 366A

On January 22, 1986, a violation of Technical Specification 3.3.3.11 was discovered. Technical Specification 3.3.3.11 requires, in part, demonstration of operability of radioactive gaseous effluent monitoring instrumentation [IL] by the periodic performance of channel checks, source checks, channel calibrations and analog channel operational tests.

At approximately 0715 CST on January 22, during a routine review of Instrumentation and Control Calibration procedures, it was discovered that the appropriate surveillances on the sampler flow rate monitors [IL-MON] for the Unit Vent System [VL] and Radwaste Building Vent System [VH] had been inadvertently excluded from the surveillance program. Unlike the other radiation monitoring skids in the plant, these systems contain a separate flow path for noble gas activity monitoring and for particulate/iodine activity monitoring. Each of these flow paths contain a dedicated sampler flow rate monitor. Prior to this discovery, the required surveillances had only been performed on the noble gas sampler flow rate monitor.

The surveillances which had inadvertently been omitted from the surveillance program were the daily channel check on the particulate and iodine monitoring skid sampler flow rate monitor for the Unit Vent System radiation monitor [IL-MON] GT-RE-21A, and Radwaste Building Vent System radiation monitor [IL-MON] GH-RE-10A; and the quarterly analog channel operational test on the particulate and iodine monitoring skid sampler flow rate monitor for the Unit Vent System radiation monitor GT-RE-21A.

Since these required surveillances had not been performed since receipt of the facility operating license (March 11, 1985), this Technical Specification violation had been in existence since that time. During this time period, plant conditions have varied from Mode 6, during initial fuel loading, through Mode 1, Power Operation, at reactor power levels up to 100 percent power.

Upon discovery of this situation, the Unit Vent and Radwaste Building Vent Systems were declared inoperable, and the appropriate actions were implemented. The surveillances which had been missed were completed satisfactorily at approximately 1414 CST on January 22, thereby restoring the Unit Vent and Radwaste Building Vent Systems to operable status.

The root cause of this event was a cognitive personnel error during procedure development which resulted in the omission of required surveillances from applicable procedures. The appropriate procedures have been revised to include instructions for these surveillances to be performed. A comparison of the surveillance requirements of Technical Specification 3.3.3.11 and the surveillance program revealed no other instances of noncompliance.

NRC Form 366A (9-63)	LICENSEE EVENT R	UATION	U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES 8/31/85					
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actual plant effluents from the unit vent for particulate, iodine, and gaseous radioactivity, and provides indication in the Control Room. Since the analog channel operational test performed on January 22 confirmed that no setpoint drift has occurred in this monitor, there is no evidence to suggest that the monitor was incapable of serving its intended function (particulate and iodine activity monitoring) during the time period of the missed surveillances. The Radwaste Building Ve t radioactivity monitor, GH-RE-10, monitors the gaseous effluents for all parts of the Radwaste Building. Upon resumption of the required surveillances, no evidence of monitor malfunction was discovered. The operability of parallel radiation monitors GT-RE-21B and GH-RE-10B, which monitor noble gas effluents, was not affected by this event.

There was no damage to plant equipment as a result of this situation, and at no time did conditions develop that might have posed a threat to the health or safety of the public.

Previous similar occurrences of procedure omissions which resulted in Technical Specification violations are discussed in Licensee Event Reports 85-005-00, 85-016-00, and 85-080-00.



KANSAS GAS AND ELECTRIC COMPANY

GLENN L KOESTER VICE PRESIDENT NUCLEAR

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February 21, 1986

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

Mr. E.H. Johnson, Director Division of Reactor Safety and Projects U.S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

KMLNRC 86-031
Re: Docket No. STN 50-482
Subj: License Event Report 86-003-00

Gentlemen:

The attached Licensee Event Report is submitted pursuant to 10 CFR 50.73 (a) (2) (i) concerning a Technical Specification violation.

Yours very truly,

Gleun Locaste

Glenn L. Koester Vice President - Nuclear

GLK:see

Enclosure

xc: PO'Connor (2), w/a JCummins, w/a

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