

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Clinton Power Station	DOCKET NUMBER (2) 0 5 0 0 0 4 6 1	PAGE (3) 1 OF 0 5
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TITLE (4) Process Radiation Monitor Incorrectly Declared Operable Due to Vague Communications Results in Unmonitored Effluent Release

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 (5)
0 8	0 5	8 8	8 8	0 2 0	0 0	0 9	0 2	8 8	None			0 5 0 0 0
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OPERATING MODE (8) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (15)									
POWER LEVEL (10) 0 7 1 5	20.402(b)	20.405(i)	50.73(a)(2)(iv)	73.71(b)						
	20.405(a)(1)(ii)	50.36(e)(1)	50.73(a)(2)(v)	73.71(e)						
	20.405(a)(1)(iv)	50.36(e)(2)	50.73(a)(2)(vi)	OTHER (Specify in Abstract Below and in Text, NRC Form 366A)						
	20.405(a)(1)(iii)	X 50.73(a)(2)(ii)	50.73(a)(2)(vii)(A)							
	20.405(a)(1)(iv)	50.73(a)(2)(ix)	50.73(a)(2)(vii)(B)							
20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)								

LICENSEE CONTACT FOR THIS LER (12):

NAME D. W. Miller, Assistant Manager - Plant Radiation Protection X3313	TELEPHONE NUMBER 2 1 1 7 9 1 3 5 - 1 8 1 8 1 1
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13):

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14):

<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15):	MONTH DAY YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16):

ABSTRACT

On August 6, 1988, at approximately 0307 hours, with the plant in Mode 1 (POWER OPERATION), the Division II Shutdown Service Water (SX) Radioactive Liquid Effluent Monitor, IRIX-PR039, was found to be in standby, rendering the monitor inoperable. The monitor had been incorrectly declared operable August 5, 1988, at approximately 0810 hours. Technical Specification 3.3.7.11 requires that grab samples be taken every twelve hours when the monitor is inoperable and an effluent is released via the monitored pathway. Grab samples were suspended when the monitor was incorrectly declared operable. The last SX effluent sample was taken at approximately 0512 hours, August 5, 1988. On August 6, 1988, when the monitor was found in standby, it was placed in service, returning it to an operable status. Technical Specification 3.3.7.11 was violated because grab samples were not taken during the twenty-two hour period when IRIX-PR039 was incorrectly thought to be operable and effluent was released. Vague communications between the Shift Supervisor (SS) and Radiation Protection (RP) led to the failure of the SS to ensure operability requirements were met. Additionally, the RP technician involved in the event failed to question the status of IRIX-PR039. Corrective actions include establishing area and process radiation monitor status boards and clarifying departmental responsibilities.

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TEXT (if more space is required, use additional NRC Form 305A) (17)

DESCRIPTION OF EVENT

On August 6, 1988, at approximately 0307 hours, with the plant in Mode 1 (POWER OPERATION), at approximately 75% reactor [RCT] power, the Division II Shutdown Service Water (SX) [BI] Radioactive Liquid Effluent Monitor [MON], IRIX-PRO39, was found in the standby condition, rendering the monitor inoperable. Upon discovering that the monitor was inoperable, it was placed in service and declared operable. An effluent grab sample was taken to determine if any radioactive effluent had been released. Further investigation into the event revealed that the monitor had incorrectly been declared operable on August 5, 1988, at approximately 0810 hours. While the monitor was inoperable effluent was released via the SX effluent pathway.

Technical Specification 3.3.7.11 requires the monitor for each SX Division to be operable when effluent is released via the monitored pathway. If a monitor is inoperable, this Technical Specification requires that grab samples of the effluent be collected and analyzed for radioactivity at least once per twelve hours. The last sample, prior to discovering that the monitor was inoperable, was taken at approximately 0512 hours on August 5, 1988. Grab samples were not taken for approximately twenty-two hours when the monitor was inoperable and effluent was released via the SX pathway. Therefore, the requirements of Technical Specification 3.3.7.11 were not met.

On July 30, 1988, at approximately 0530 hours, IRIX-PRO39 was declared inoperable, and placed in standby in order to perform maintenance to correct problems with the monitor's alarm. Limiting Condition for Operation (LCO) ACTION 88-07-46 was entered to track the monitor's inoperable status.

Chemistry was notified of the need to sample the Division II SX effluent and continued to take and analyze samples every twelve hours until the monitor was declared operable.

On August 5, 1988, the maintenance on monitor IRIX-PRO39 was completed. Prior to declaring the monitor operable, the Shift Supervisor (S) contacted the Radiation Protection (RP) office to determine the status of IRIX-PRO39. RP indicated that the daily channel checks, performed in accordance with Clinton Power Station (CPS) Procedure 9911.24, "Area/Process Radiation Monitors (AR/PR) [IL] Shiftly/Daily Surveillances" had just been completed by RP with satisfactory results. The SS was not aware that these channel checks were performed while IRIX-PRO39 was in the standby condition. RP did not inform the SS that the monitor was in standby, and the SS did not specifically request RP to place the monitor in service.

Additionally, the Radiation Protection technician who performed Procedure 9911.24 did not question the status of IRIX-PRO39, since the test results were satisfactory and since the SS did not request the monitor be taken out of standby.

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TEXT (if more space is required, use additional NRC Form 305A's) (17)

At approximately 0810 hours, on August 5, 1988, the SS incorrectly cleared LCO ACTION 88-07-46 and declared IRIX-PRO39 operable while the monitor was in standby. The SS notified Chemistry that the monitor had been declared operable, and sampling was suspended. The last Division II SX effluent sample was obtained at approximately 0512 hours, on August 5, 1988.

On August 6, 1988, at approximately 0307 hours, a Chemistry technician questioned the SS and RP on the status of IRIX-PRO39. RP reported that the monitor was in standby. The SS directed RP to place the monitor in service, and declared the monitor operable. The SS also directed Chemistry to take a grab sample of the SX effluent to determine if any radioactive effluent had been released. The sample results were less than the lower limit of detection specified in Technical Specification 3.3.7.11 ACTION 111.

Technical Specification 3.3.7.11 was violated since no effluent grab samples were taken for approximately twenty-two hours while IRIX-PRO39 was inoperable and effluent was released via the SX effluent pathway.

No automatic or manually initiated safety system responses were necessary to place the plant in a safe and stable condition. No other equipment or components were inoperable at the start of this event such that their inoperable condition contributed to this event.

CAUSE OF EVENT

Due to vague communications between the SS and Radiation Protection personnel the SS failed to ensure IRIX-PRO39 was properly placed in an operable status prior to the monitor being declared operable.

Additionally, the RP technician involved failed to question the status of IRIX-PRO39 since Procedure 9911.24 was completed with satisfactory results, and since the SS did not request that the monitor be taken out of standby.

CORRECTIVE ACTION

In order to ensure that vague communications do not lead to another similar event, clarification has been provided regarding operation of the AR/PR system in order to meet Technical Specification requirements.

The Radiation Protection Shift Supervisor and the SS are now discussing each inoperable Technical Specification AR/PR monitor at shift turnover.

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TEXT (if more space is required, use additional NRC Form 366A 1/ (17))

AR/PR system status boards will be placed in the RP office and the Main Control Room. The boards will indicate required monitor status, applicable Technical Specifications, actual monitor status, and any LCO ACTIONS in effect. This action is expected to be complete by October 31, 1988.

To ensure that the SS is aware of the status of Technical Specification AR/PR monitors prior to declaring a monitor operable, Procedure 9911.24 will be revised. The revision will require that the SS sign the surveillance checklist indicating that he has reviewed the surveillance, that the monitor is operable, and that the monitor is in the desired operating status. This revision is expected to be issued by October 31, 1988.

Plant Staff-Operations personnel will receive additional training on the Area/Process Radiation Monitor system during operator requalification training. This action is expected to be complete by December 31, 1988.

The Control Room Operators have been directed to ensure their log reflects changes in operability of all Technical Specification AR/PR monitors as well as the LCO ACTION status of these monitors.

ANALYSIS OF EVENT

This event is reportable under the provisions of 10CFR50.73(a)(2)(i)(B) due to operation prohibited by the plant Technical Specifications.

An unmonitored SX effluent release resulted from the violation of Technical Specification 3.3.7.11. Technical Specification 3.3.7.11 requires grab samples to be taken every twelve hours when an SX effluent monitor is inoperable and effluent is being released via the monitored pathway. No grab samples were taken between 0512 hours on August 5, 1988, when the last sample was taken prior to incorrectly declaring IRIX-PRO39 operable, and 0307 hours on August 6, 1988, when IRIX-PRO39 was placed in service and declared operable. This was in violation of Technical Specification 3.3.7.11.

Analysis determined that this event was not safety significant for existing plant conditions or other operational modes. During the period when the SX effluent was unmonitored, SX was not providing cooling for the system heat exchangers [HX] involving potentially contaminated systems. This fact combined with grab sample results, on August 5 and 6, 1988, of less than the lower limit of detection specified in Technical Specification 3.3.7.11 ACTION 111, indicates that no radioactive liquid was discharged. Therefore, no measurable dose was received by a member of the public due to this event.

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TEXT (if more space is required, use additional NRC Form 200A's) (17)

ADDITIONAL INFORMATION

LER 87-034-00 discussed a Technical Specification violation caused by inadequate communications. Monitor 1RIX-PR042A was not placed in a tripped condition following failure of its channel functional test.

LER 87-048-00 discussed a Technical Specification violation caused by poor communications. Off-gas samples required by Technical Specifications were not taken within the required period of time.

For further information regarding this event, contact D. W. Miller, Assistant Manager-Plant Radiation Protection at (217) 935-8881, extension 3313.

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L45-88(09-02)-LP
2C.220

ILLINOIS POWER COMPANY



CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

September 2, 1988

10CFR50.73

Docket No. 50-461

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

Subject: Clinton Power Station - Unit 1
Licensee Event Report No. 88-020-00

Dear Sir:

Please find enclosed Licensee Event Report No. 88-020-00:
Process Radiation Monitor Incorrectly Declared Operable Due to Vague
Communications Results in Unmonitored Effluent Release. This report is
being submitted in accordance with the requirements of 10CFR50.73.

Sincerely yours,

A handwritten signature in cursive script that reads 'D. L. Holtzsch'.

D. L. Holtzsch
Acting Manager - Licensing and
Safety

RSF/kar

Enclosure

cc: NRC Resident Office
NRC Region III, Regional Administrator
INPO Records Center
Illinois Department of Nuclear Safety
NRC Clinton Licensing Project Manager

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