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On August 7, 1988, Quad Cities Unit One was in the RUN mode at 30 percent thermal power and Unit Two was in SHUTDOWN at 0 percent thermal power. At 1600 hours, high flow (4600 cfm) was observed in the 1/2 A Standby Gas Treatment System (SBGTS). Technical Specification 4.7.b.1 requires 4000 cfm (+/-10 percent).

The cause of this event was due to a personnel error that left closed the instrument air supply shutoff valve to the 1/2 A SBGTS flow control valve. It is speculated that this valve was left closed after a July 14, 1988 calibration.

This event wis discussed with the individual involved and to prevent recurrence, the procedure governing the calibration will be revised to incorporate a second verification of valve position for valves related to instruments that provide trip or control functions. This report is provided per IOCFR50.73(a)(2)(i).

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PLANT AND SYSTEM IDENTIFICATION:

General Electric - Boiling Water Reactor - 2511 MWt rated core thermal power.

EVENT IDENTIFICATION: 1/2 A Standby Gas Treatment System flow setting was found to be outside the Technical Specification limit.

A. CONDITIONS PRIOR TO EVENT:

Unit: One		Event Date:	August 7, 1988	Event Time:	1600
Reactor Mode:	4	Mode Name:	RUN	Power Level:	30%

This report was initiated by Deviation Report D-4-1-88-055.

RUN Mode (4) - In this position the reactor system pressure is at or above 825 psig, and the reactor protection system is energized, with APRM protection and RBM interlocks in service (excluding the 15% high flux scram).

B. DESCRIPTION OF EVENT:

On August 7, 1988, Quad Cities Unit One was in the RUN mode at 30 percent thermal power and Unit Two was in SHUTDOWN at 0 percent thermal power. At 1600 hours, surveillance QOS 7500-5 (Standby Gas Treatment System Monthly Operability Test) was initiated for th: 1/2 A Standby Gas Treatment System (SBGTS) [BH]. Flow was observed to be 4600 standard cubic feet per minute (SCFM) after settling out upon system startup. This is 200 SCFM above Technical Specification 4.7.B.1 requirements of 4000 SCFM (+/-10 percent).

An immediate investigation found the SBGTS flow control valve AO 1/2-7510A [FCV] full open. The valve had failed full open due to the isolation of instrument air [LD] to the flow control valve positioner and pressure switch (PS) [PS] 1/2-7541-32A. The manual instrument air supply shutoff valve, which supplies air to both the flow control valve positioner and pressure switch, was found closed. Instrument air pressure to the positioner of AO 1/2-7510A is sensed by PS 1/2-7541-32A. When instrument air pressure to the positioner drops below 65 psig, the pressure switch actuates to fail AO 1/2-7510A full open.

When the instrument air supply to the positioner and pressure switch was returned to normal (by opening the manual sutoff value), flow was controlled at 4300 SCFM which meets the requirements of Technical Specification 4.7.8.1. QOS 7500-5 was successfully completed later at approximately 0208 hours on August 8, 1903. The 1/2 B SBGTS was demonstrated operable via QOS 7500-5 at approximately 1230 Jurs on August 8, 1988.

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A subsequent investigation revealed that pressure switch 1/2-7541-32A was calibrated last on July 14, 1988. The calibration was performed in accordance with QIP 100-11, Revision 3 (Calibration Of Instruments Used By Operations In Performing Their Surveillance Requirements). The calibration was documented on QIP 100-T11, Revision 8 (Calibration Record Of Instruments Used By Operations In Performing Their Surveillance Requirements). Pressure switch 1/2-7541-32A is required by the procedure to be isolated prior to calibration.

The 1/2 A SBGTS was started on July 22, July 28, August 5, and August 6, 1988. The longest run of these four operations was approximately 15 minutes. Computer point history shows the 1/2 A SBGTS had high flows on these four runs. Therefore, the instrument air supply shutoff valve was closed (or left closed) sometime between the period of July 14, 1988 (date of PS 1/2-7541-32A calibration), and July 22, 1988 (first train run after calibration).

C. APPARENT CAUSE OF EVENT:

This report is provided to comply with IOCFR50.73(a)(2)(1): the licensee shall report any operation or condition prohibited by the plant's Technical Specifications.

The cause of high flow (4600 SCFM) through the 1/2 A SBGTS can be attributed to personnel error. It is speculated that the Instrument Mechanic (IM) who performed the July 14, 1988, calibration left the instrument air shutoff valve closed, isolating instrument air to flow control valve AO 1/2-7510A.

A contributing cause to this event was that the procedure in use did not require a second verification of valve position.

D. SAFETY ANALYSIS OF EVENT:

The Standby Gas Treatment Systems are provided to maintain a negative pressure in the reactor building [NG] when it is isolated. This is to prevent the ground level release of airborne activity and to treat the effluent from the reactor building prior to discharge through the main chimney [WF] to minimize the release of radioactive material to the environment in the event of a design basis accident.

Due to the increased flow, the residence time is somewhat reduced at a non-linear rate, and it is estimated that the carbon filters would have a slightly shorter life. However, the redundant SBGTS was operable at all times from July 14, 1988, to August 8, 1988, and had the need arisen, could nave been manually started to backup the running train.

E. CORRECTIVE ACTION:

This item was discussed with the individual involved and with the IM Department at a weekly department tailgate meeting.

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Corrective action will consist of a revision to QIP 100-11 and QIP 100-T11. Instruments referenced in QIP 100-T11 are currently being reviewed by the Instrument Maintenance Department for their impact on control or trip functions. Those instruments that possess control or trip functions will be noted on QIP 100-T11. All associated instrument valves will require a second verification to ensure proper position. Revisions to QIP 100-T11 and QIP 100-11 are expected to be complete on or about October 15, 1988. This effort will be tracked by NTS 2542008805501.

On four occasions, correct operator response to system operating parameters would have reduced the time between the initial error and detection. The following corrective actions were identified to strengthen the operator's response:

- The SBGTS flow meters (1/2-7540-13A(B)) will be color-banded showing Technical Specification 4.7.B.1 flow requirements and limitations for easier identification per Work Requests Q69020 and Q69021 (NTS 2542008805502).
- In addition, this event will be incorporated into the Station's "Lessons Learned" license training to stress the importance of monitoring equipment parameters when equipment is started to assure proper operation (NTS 2542008805503).

F. PREVIOUS EVENTS:

9.

There have been no previous similar events pertaining to high flow on the SBGTS.

G. COMPONENT FAILURE DATA:

There was no component failure in this event.



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Commonwealth Edison Quad Cities Nuclear Power Station 22710 206 Avenue North Cordova, Illinois 61242 Telephone 309/654-2241

RLB-88-290

August 29, 1988

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

Reference: Quad-Cities Nuclear Power Station Docket Number 50-254, DPR-29, Unit One

Enclosed is Licensee Event Report (LER) 88-012, Revision 00, for Quad-Cities Nuclear Power Station.

This report is submitted in accordance with the requirements of the Code of Federal Regulations, Title 10, Part 50.73(a)(2)(i): the licensee shall report any operation or condition prohibited by the plant's Technical Specifications.

Respectfully.

COMMONWEALTH CDISON COMPANY QUAD-CITIES NUCLEAR POWER STATION

Station Manager

RLB/DWH/ad

Enclosure

cc: I. Johnson R. Higgins INPO Records Center NRC Region III