



Log # TXX-98211
File # 10200
Ref. # 10CFR50.73(a)(2)(i)

C. Lance Terry
Senior Vice President
& Principal Nuclear Officer

October 2, 1998

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)-UNIT 1 & 2
DOCKET NOS. 50-445 & 50-445
CONDITIONS PROHIBITED BY TECHNICAL SPECIFICATIONS
LICENSEE EVENT REPORT 445/98-006-00

Enclosed is Licensee Event Report (LER) 98-006-00 for Comanche Peak Steam Electric Station Unit 1 and 2, "Technical Specification Surveillance for Hydrogen Recombiner System May Not Have Been Adequate."

The subject issue was discovered on August 31, 1998. However, it was not deemed reportable until September 2, 1998. This communication contains no new licensing basis commitments regarding CPSES Unit 1 and Unit 2.

Sincerely,

C. L. Terry

C. L. Terry

By: *Roger D. Walker*
Roger D. Walker
Regulatory Affairs Manager

9810060256 981002
PDR ADOCK 05000445
S PDR

OB:ob
Enclosure

cc: Mr. E. W. Merschoff, Region IV
Mr. J. I. Tapia, Region IV
Resident Inspectors, CPSES

IE221

NRC FORM 366
(4-95)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 150-0104
EXPIRES 4/30/98

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

Facility Name (1)

COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1 & 2

Docket Number (2)

05000445

Page (3)

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Title (4)

TECHNICAL SPECIFICATION SURVEILLANCE FOR HYDROGEN RECOMBINER SYSTEM MAY NOT HAVE BEEN ADEQUATE

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 Name		Docket Numbers	
08	31	98	98	006	00	10	02	98	CPSES UNIT 2		05000446	
									N/A		050000	

Operating Mode (9)	1	This report is submitted pursuant to the requirements of 10 CFR 6. (Check one or more) (11)															
Power Level (10)	100	<input type="checkbox"/> 20.2201 (b)	<input type="checkbox"/> 20.2203 (a) (1)	<input type="checkbox"/> 20.2203 (a) (2) (i)	<input type="checkbox"/> 20.2203 (a) (2) (ii)	<input type="checkbox"/> 20.2203 (a) (2) (iii)	<input type="checkbox"/> 20.2203 (a) (2) (iv)	<input checked="" type="checkbox"/> 50.73 (a) (2) (i)	<input type="checkbox"/> 50.73 (a) (2) (ii)	<input type="checkbox"/> 50.73 (a) (2) (iii)	<input type="checkbox"/> 50.73 (a) (2) (iv)	<input type="checkbox"/> 50.73 (a) (2) (v)	<input type="checkbox"/> 50.73 (a) (2) (vii)	<input type="checkbox"/> 50.73 (a) (2) (viii)	<input type="checkbox"/> 50.73 (a) (2) (x)	<input type="checkbox"/> 73.71	<input type="checkbox"/> OTHER
		<input type="checkbox"/> 20.2203 (a) (2) (i)	<input type="checkbox"/> 20.2203 (a) (2) (ii)	<input type="checkbox"/> 20.2203 (a) (2) (iii)	<input type="checkbox"/> 20.2203 (a) (2) (iv)	<input type="checkbox"/> 50.36 (c) (1)	<input type="checkbox"/> 50.36 (c) (2)	<input type="checkbox"/> 50.73 (a) (2) (vi)	<input type="checkbox"/> 50.73 (a) (2) (vii)	Specify in Abstract below or in NRC Form 366A							

Name: Russell A. Smith - Maintenance Support Manager
 Licensee Contact For This LER (12)
 Telephone Number (include Area Code): (254)897-6901

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
				N					

Supplemental Report Expected (14): YES (If yes, completed EXPECTED SUBMISSION DATE) X NO
 EXPECTED SUBMISSION DATE (15):

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On August 31, 1998, during an evaluation of a deficiency report, an engineer (utility, non-licensed) noted some inconsistency in historical data for heater to ground resistance. Further review of the issue could not conclude that the surveillance required by Comanche Peak Steam Electric Station (CPSES) Technical Specification section 4.6.4.2.b.3) was performed adequately for Train A of the Hydrogen Recombiner system (EIIS:(BB):(RCB)) for Unit 1 and Unit 2. The Train B surveillances were deemed adequate based on the available data for Unit 1 and Unit 2.

TU Electric has evaluated the circumstances concerning the improper surveillance methodology, and believes that the erroneous surveillance was caused due to less than adequate procedural instructions. Corrective actions included surveillance testing of the Hydrogen Recombiners and revision to the applicable procedures.

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TEXT CONTINUATION

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Text (if more space is required, use additional copies of NRC Form 366A) (17)

I. DESCRIPTION OF THE REPORTABLE EVENT

A. REPORTABLE EVENT CLASSIFICATION

Conditions prohibited by plant Technical Specifications.

B. PLANT OPERATING CONDITIONS PRIOR TO THE EVENT

On August 31, 1998, Comanche Peak Steam Electric Stations (CPSSES) Units 1 and 2 were in Mode 1, Power Operation.

C. STATUS OF STRUCTURES, SYSTEMS, OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

There were no structures, systems, or components that were inoperable that contributed to the event.

D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES

On August 31, 1998, during evaluation of a deficiency document, an engineer questioned the historical data for the surveillance that verifies the integrity of the heater electrical circuits for the Hydrogen Recombiner System by performing a resistance to ground test. It could not be conclusively ascertained if the resistance measurements were adequately taken for all the surveillances performed prior to July 1998. A recent revision to the surveillance procedure and subsequent performance on Train B hydrogen recombiners ensured that the surveillance was performed adequately using the correct methodology for the resistance test. Train A for both Unit 1 and Unit 2 were deemed inoperable and the required surveillances were performed with satisfactory results. This event was considered reportable pursuant to the requirements of 10CFR50.73(a)(2)(i), i.e., a condition prohibited by plants technical specifications on September 2, 1998.

E. THE METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE, OR PROCEDURAL OR PERSONNEL ERROR

On August 31, 1998, during a review of a deficiency document, it was determined that the procedural guidance provided in the applicable procedures was not adequate to perform a proper resistance to ground test, which verifies the integrity of the heater electrical circuits for the Hydrogen Recombiner System.

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Text (if more space is required, use additional copies of NRC Form 366A) (17)

II. ANALYSIS OF THE EVENT

A. SAFETY SYSTEM RESPONSES THAT OCCURRED

Not applicable - no safety system responses occurred as a result of this event.

B. DURATION OF SAFETY SYSTEM TRAIN INOPERABILITY

On August 31, 1998 plant engineering determined that the required resistance measurements taken to verify the integrity of the heater electrical circuits for the Hydrogen Recombiner System were questionable. Based on the aforementioned Train A for Unit 1 was deemed indeterminate for approximately 15 hours and Unit 2 was indeterminate for approximately 6 days and 10 hours, until a successful surveillance of the Hydrogen Recombiner was completed. Train B for both Unit 1 and Unit 2 were deemed operable because a current and acceptable surveillance record was available.

C. SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT

The Hydrogen Recombiner Systems are required to be manually operated following a loss of coolant accident to maintain the Containment hydrogen concentration below the flammability limit, thereby limiting potential accident consequences. Compliance with the CPSES Technical Specification (TS) 3.6.4.2 surveillance requirements demonstrates that the Hydrogen Recombiner Systems are operable. The surveillance in question is the measurement of the resistance of the heater elements, which is performed on an 18-month frequency. Every 6 months, TS 3.6.4.2 also requires the performance of a Hydrogen Recombiner functionality surveillance. A review of the results of the functionality surveillances did not identify any concerns that would affect the operability of the system. Additionally, in the unlikely event of both the recombiners failing, a diverse method of reducing hydrogen concentration is available utilizing the Containment Purge System. Based on the aforementioned, it is concluded that the health and safety of the public was unaffected by this event.

IV. CAUSE OF THE EVENT

TU Electric believes that the procedural guidance provided to perform the surveillance was less than adequate.

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Text if more space is required, use additional copies of NRC Form 366A (17)

V. CORRECTIVE ACTIONS

Immediately following the discovery of the questionable surveillance on August 31, 1998, the Hydrogen Recombiner system (Train A) was declared inoperable and an acceptable surveillance was completed for both Unit 1 and Unit 2. Applicable procedures have been revised to prevent recurrence.

VI. PREVIOUS SIMILAR EVENTS

There have been previous similar events that pertain to missed surveillances. However, the causes for those events were sufficiently different than this event such that the corrective actions would not have prevented this event.

VII. ADDITIONAL INFORMATION

The times listed in the report are approximate and Central Standard Time.