

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2) 0 5 0 0 0 3 8 2	PAGE (3) 1 OF 0 5
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TITLE (4)  
Missed Chemistry Sample Due to Cognitive Personnel Error

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)
0	4	1	3	8	8	8	8	8	N/A		0 5 0 0 0
0	4	1	3	8	8	0	0	7	N/A		0 5 0 0 0

OPERATING MODE (9) 5

POWER LEVEL (10) 10

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)

20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
20.405(a)(1)(i)	50.38(e)(1)	50.73(a)(2)(v)	73.71(c)
20.405(a)(1)(ii)	50.38(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)(i)	50.73(a)(2)(vii)(A)	
20.405(a)(1)(iv)	50.73(a)(2)(ii)	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 R.E. Allen, Chemistry Department Head	TELEPHONE NUMBER
	AREA CODE: 5 0 4    4 6 4 - 3 1 2 9

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)

YES (If yes, complete EXPECTED SUBMISSION DATE)  NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

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

At 1121 hours on April 13, 1988, Waterford Steam Electric Station Unit 3 was in cold shutdown when it was discovered that a monthly Technical Specification (TS) sampling requirement was missed. The previous plant stack tritium sample was performed on March 3, 1988. On April 11, 1988 a supervisor discovered the sample was overdue, but incorrectly concluded the containment purge sample satisfied the surveillance. On April 13, 1988 the supervisor learned the sample cannot be substituted and the plant stack tritium sample was taken. The maximum allowable surveillance interval was exceeded on April 8, 1988, therefore the plant operated in a condition prohibited by TS for five days.

The root cause of this event is cognitive personnel error due to not filing the surveillance tickler cards. This resulted in the sample not being scheduled. Contributing causes were that the computer tracking system did not include this sample and no one was assigned specific responsibility to ensure the tickler cards are filed properly. The sample was taken and found to be in specification. Chemistry Technicians and their Supervisor were counseled. Procedures are being revised and an independent evaluation of the chemistry TS program has been performed. Since the sample was in specification when performed and the plant is shutdown for refueling there is no health hazard or safety significance to this event.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR 8   8	SEQUENTIAL NUMBER —   0   0   7	REVISION NUMBER —   0   0			

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

At 1121 hours on April 13, 1988, Waterford Steam Electric Station Unit 3 was in cold shutdown when it was discovered that a monthly Technical Specification (TS) sampling requirement was missed. TS Surveillance Requirement 4.11.2.1.2 requires a plant stack (EISS Identified VL) tritium sample to be taken and analyzed monthly. The surveillance was last performed on March 3, 1988. On April 11, 1988 Health Physics personnel informed the Radiochemistry Supervisor that they had not yet received the results of the plant stack tritium sample. The supervisor checked and discovered the sample was overdue but, since containment purge was in operation, incorrectly concluded that the containment atmosphere (EISS Identifier IK) tritium sample taken on April 2, 1988 could be substituted for the plant stack sample surveillance. On April 13, 1988, the supervisor learned that the two samples are taken at different points and cannot substitute for one another. The supervisor also discovered the sample tickler cards scheduled for April had not been placed in the 31 day file. The 31 day file is checked each day and the samples on the tickler cards scheduled for that day are taken and analyzed. There is a sample tickler card for all samples. No other samples were missed due to effective backup scheduling methods. The plant stack tritium sample was taken at 1150 hours on April 13, 1988. The maximum allowable surveillance interval of TS 4.0.2 was exceeded on April 8, 1988, therefore the plant operated in a condition prohibited by TS for five days.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8   8	-   0   0   7	-   0   0	0   3	OF	0   5

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

The root cause of this event is cognitive personnel error due to not filing the tickler cards of samples due in April into the 31 day file. On the first day of each month it has been the customary practice for the first shift of the month to take the sample tickler cards scheduled for that month and place them into the 31 day file on the day that each sample should be performed. Each sample has its own tickler card. Each day the file is checked and the samples scheduled for that day are performed. After a sample is performed its tickler card is placed in the month-next-due file or in a later slot in the 31 day file, depending on the frequency of analysis. The tickler cards in the April month-next-due file were not transferred to the day file but remained in the April file. Due to the plant being in hot shutdown, most TS surveillances were no longer required. Those that were required were identified and performed under a backup scheduling system. There were some contributing causes to this event: the computer system for scheduling and tracking TS samples did not include the plant stack tritium sample, the procedure for maintaining the sample tickler file does not assign responsibility for action, and chemistry procedures could more clearly state that the samples are taken from separate points.

Licensee Event Report 87-025-00 reported four instances of missed TS sampling requirements between October 3, 1987 and October 16, 1987. The required frequency of each sample missed was weekly or less. The root cause of these events was a programmatic breakdown in administrative controls. In each of the four cases there was no administrative control or second check to detect and correct a missed sample in a timely manner. In the corrective actions the Chemistry Department implemented a formal watchstation turnover sheet and a TS surveillance logsheet. The formal watchstation turnover sheet would not have tracked an unscheduled sample and the TS surveillance logsheet only tracks samples performed at a frequency of weekly or less. Although these corrective actions have proven effective for samples performed weekly or less they are not adequate to provide a backup check for samples performed at intervals greater than weekly.

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		88	007	00	04	OF	05

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

A plant stack tritium sample was taken and analyzed on April 13, 1988; the activity was within the specified limits. No other samples scheduled in April were overdue. The Radiochemistry Supervisor and all Chemistry Technicians have been counseled. The computer tracking system is the Station Information Management System (SIMS) computer program. SIMS is used to schedule and track TS samples with a frequency greater than weekly. Three weeks prior to the due date a task card is printed and placed in the day file with the tickler card. The plant stack tritium sample is now scheduled by SIMS. Chemistry Procedure CE-1-004 "Periodic Analysis Scheduling Program", which is the tickler file procedure, is being revised to assign specific responsibility for required actions. Also, the procedure will require a supervisory review of the tickler file. Chemistry Procedure CE-1-003 "Reporting Chemistry Data" which provides the instructions for reporting chemistry data will be revised to add an extra check to the Weekly TS Surveillance Check Sheet to ensure the tickler card file receives a supervisory review. Chemistry Procedure CE-2-100 "Chemistry TS Surveillance Performance Coordination" is being revised to include the tritium analyses. The purpose of this procedure is to identify individual Chemistry Procedures and actions necessary to perform TS surveillances. The procedures governing performance of the plant stack and containment purge tritium analyses will be included in CE-2-100 to ensure there is no confusion between the samples. Chemistry Procedure CE-3-305 "Sampling of Ventilation and Gaseous Waste Management Systems for Radioactive Effluents" which provides instructions for obtaining samples will be revised to provide clearer instructions for performing the containment purge and plant stack tritium samples. The Nuclear Operations Support and Assessment (NOSA) Department performed an independent and detailed evaluation of the Chemistry Sampling Program with regards to chemistry TS requirements, scheduling implementation and completion documentation methods. This evaluation has identified some program deficiencies and provides recommendations. The Chemistry Department is reviewing the NOSA evaluation to determine the applicability of their recommended corrective actions. The Chemistry Department will implement the above corrective actions by June 30, 1988.

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		8 8	0 0 7	- 0 0	0 5	OF 0 5

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

The plant has been shutdown for refueling since April 1, 1988 and the containment atmosphere tritium sample has remained in specification throughout this event. There has been no major source for release of tritium, since prior to April 13, 1988 the refueling pool had not yet been filled nor had the reactor coolant system been breached. When the plant stack tritium sample was taken and analyzed it was in specification, therefore there was no health hazard or safety significance to this event.

SIMILAR EVENTS

LERs 87-25, 86-17, 86-10, 86-06, 85-19, 85-11

PLANT CONTACT

R.E. Allen, Chemistry Department Head, 504/464-3129



**LOUISIANA**  
POWER & LIGHT

WATERFORD 3 SES • P.O. BOX B • KILLONA, LA 70066-0751

Ref: 10CFR50.73(a)(2)(i)

May 12, 1988

W3A88-0054  
A4.05  
QA

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

SUBJECT: Waterford 3 SES  
Docket No. 50-382  
License No. NPF-38  
Reporting of Licensee Event Report

Attached is Licensee Event Report Number LER-88-007-00 for Waterford Steam Electric Station Unit 3. This Licensee Event Report is submitted pursuant to 10CFR50.73(a)(2)(i).

Very truly yours,

N.S. Carns  
Plant Manager - Nuclear

NSC/WMC:rk

Attachment

cc: R.D. Martin, NRC Resident Inspectors Office, INPO Records Center  
(J.T. Wheelock), E.L. Blake, W.M. Stevenson, D.L. Wigginton

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