

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Perry Nuclear Power Plant, Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 4 0	PAGE (3) 1 OF 0 3
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TITLE (4)
Personnel Errors Lead to Missed surveillance on Division 2 and 3 Diesel Fuel Oil Storage Tanks.

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	2	2	0	8	8	8	8	8	0	3	1	0	0	0	9	2	2	8	8	0	5	0	0	0
													0	5	0	0	0							

OPERATING MODE (9)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)									
POWER LEVEL (10)	<input type="checkbox"/>	20.402(b)	<input type="checkbox"/>	20.405(c)	<input type="checkbox"/>	50.73(a)(2)(iv)	<input type="checkbox"/>	73.71(b)		
	<input type="checkbox"/>	20.405(a)(1)(i)	<input type="checkbox"/>	50.36(e)(1)	<input type="checkbox"/>	50.73(a)(2)(v)	<input type="checkbox"/>	73.71(e)		
	<input type="checkbox"/>	20.405(a)(1)(ii)	<input type="checkbox"/>	50.36(e)(2)	<input type="checkbox"/>	50.73(a)(2)(vi)	<input type="checkbox"/>	OTHER (Specify in Abstract below and in Text, NRC Form 366A)		
	<input type="checkbox"/>	20.405(a)(1)(iii)	<input checked="" type="checkbox"/>	50.73(x)(2)(i)	<input type="checkbox"/>	50.73(a)(2)(vii)(A)	<input type="checkbox"/>			
	<input type="checkbox"/>	20.405(a)(1)(iv)	<input type="checkbox"/>	50.73(x)(2)(ii)	<input type="checkbox"/>	50.73(a)(2)(vii)(B)	<input type="checkbox"/>			
	<input type="checkbox"/>	20.405(a)(1)(v)	<input type="checkbox"/>	50.73(x)(2)(iii)	<input type="checkbox"/>	50.73(a)(2)(x)	<input type="checkbox"/>			

LICENSEE CONTACT FOR THIS LER (12)									
NAME Gregory A. Dunn, Compliance Engineer, Extension 6484							TELEPHONE NUMBER 2 1 1 6 2 1 5 9 1 - 1 3 1 7 3 7		
AREA CODE									

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)							EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO											

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

On August 24, 1988 at approximately 1400 an audit team discovered that the quarterly surveillance instruction (SVI), which removes water from Division 2 and 3 Fuel Oil Storage Tanks, was missed due to personnel errors resulting in it being mis-scheduled. Consequently, the Technical Specification 4.8.1.1.2.c surveillance requirement was not met for Divisions 2 and 3, and the appropriate actions not taken. The late date for the SVI was February 20, 1988. The next satisfactory performance of this SVI was on April 15, 1988, fifty five days after the late date.

The root cause for the event was personnel error due to inattention to detail and failure to follow administrative procedure involving documentation and review of the surveillance package.

This event has been discussed with the personnel involved as part of the investigation. To prevent recurrence of this event the governing administrative procedure will be changed to enhance communications between the reviewers and SVI coordinators by assuring positive communications and facilitate followup of scheduling changes. Additionally, the appropriate Operations personnel, assigned reviewers and SVI coordinators will review the events described in this LER.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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TEXT (If more space is required, use additional NRC Form 368A's) (17)

On August 24, 1988 at approximately 1400 an audit team discovered that the quarterly surveillance instruction (SVI), which removes water from Division 2 and 3 Fuel Oil Storage Tanks [TK] [DE], was missed due to personnel errors resulting in it being mis-scheduled. Consequently, the Technical Specification 4.8.1.1.2.c surveillance requirement was not met for Divisions 2 and 3, and the appropriate actions not taken. The late date for the SVI was February 20, 1988. The next satisfactory performance of this SVI was on April 15, 1988, fifty five days after the late date. The reactor operated at power during this period of time. At the time of the scheduling error the plant was in an outage with the reactor in mode 4, cold shutdown.

SVI-R45-T1323, "Remove Water From Fuel Storage Tanks", is an SVI that has three sections for removing water from each of the three storage tanks. On October 30, 1987, SVI-R45-T1323 was completed satisfactorily on all three divisions of diesel generators. During a plant outage on January 15, 1988 a partial SVI was performed for Division 1 (only) in conjunction with filling the Day Tank following maintenance per the plant operating procedure. However, full credit for scheduling was incorrectly assigned and the next performance of the SVI was scheduled in the following quarter. It was satisfactorily performed for all three divisions on April 15, 1988.

The root cause for the event was personnel error due to inattention to detail and failure to follow administrative procedure. A test performer incorrectly marked the Data Package Cover Sheet (DPCS), which was signed by the lead test performer, a supervising operator. The Unit Supervisor (US) verified the SVI performance and signed the DPCS, yet did not notice that it was marked incorrectly. The errors involved inattention to detail in completing and reviewing the DPCS as the SVI data sheets clearly indicated that only a partial test was performed.

Several additional errors occurred during the review process, which was completed on January 21, 1988 prior to the late date. The responsible system engineer (RSE) discovered that the DPCS was mismarked as "Full Completion" and corrected it to "Partial Completion." However, the scheduling implications were not apparent to the reviewer as he was not aware of that responsibility. Consequently, he did not correct the Task Completion box on the DPCS from "Credit" (for scheduling) to "NO Credit." However, per the Administration procedure, the assigned reviewer has the responsibility to ensure that if credit for scheduling is taken, the incomplete or failed portions of the SVI have appropriate methods for ensuring completion e.g. potential LCO and Work Order programs. This was not done.

Finally the Scheduling group failed to notice or recognize the inconsistency on the DPCS. The RSE commented on the DPCS "Partial SVI is Acceptable" and the Partial Completion and Credit boxes were checked. However, the methods to track the completion of the SVI tasks, which is required per the governing administrative procedure, were not indicated on the DPCS. Therefore, questioning of the reviewer by the SVI scheduling group was appropriate and would have resulted in correcting the scheduling performed earlier.

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TEXT (If more space is required, use additional NRC Form 365A's) (17)

The OPERABILITY of the power sources are consistent with the initial condition assumptions of the safety analyses and are based upon maintaining at least Division 1 or Division 2 of the onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite A.C. or D.C. source. Division 3 supplies the high pressure core spray system [BG] only.

The Fuel Oil Storage Tanks transfer pumps [P] take suction 18 inches off the bottom of the tank. Thereby minimizing the potential for entraining any sediments or water to the Day Tank. During the period between the two full completions of the SVI, the Division 2 Diesel Generator [DG] was run weekly and the Division 3 DG was run monthly. After each of these diesel runs, which involves transfer of fuel oil to the Day Tank, a different SVI is performed to sample the fuel oil in the Day Tank for water. No significant quantities were ever found. Moreover, the April performance of SVI-R45-T1323 did not indicate any unusual amounts of water. Finally, offsite power was not lost during the period between complete surveillances. Therefore, this event is considered to have no safety significance. No previous similar events have been identified.

This event has been discussed with the personnel involved as part of the investigation. To prevent recurrence of this event the governing administrative procedure will be changed to enhance communications between the reviewers and SVI coordinators by assuring positive communications and facilitate followup of scheduling changes. Additionally, the appropriate Operations personnel, assigned reviewers and SVI coordinators will review the events described in this LER.

Energy Industry Identification System codes are identified in the text as [XX].