

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-8 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)
Clinton Power Station

DOCKET NUMBER (2)
05000461

PAGE (3)
1 OF 4

TITLE (4)
Failure to Perform Surveillance Testing on Division II 4.16 KV Bus Undervoltage Relay Within the Specified Frequency of the Technical Specifications Due to Inadequate Software Change Management

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 NUMBER
09	18	98	1998	027	00	10	19	98	None	05000
									None	05000

OPERATING MODE (9) 4	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)									
		20.2201(b)		20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	50.73(a)(2)(i)		50.73(a)(2)(viii)		
	POWER LEVEL (10) 000		20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)	
			20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71	
		20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER		
		20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A		
	20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)					

LICENSEE CONTACT FOR THIS LER (12)
NAME: J. D. Wisher, Surveillance Coordinator, Work Management
TELEPHONE NUMBER (include Area Code): (217) 935-8881, Extension 3494

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

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 15 single-spaced typewritten lines) (16)

On September 18, 1998, at approximately 1100 hours it was discovered that functional testing of the Division II 4.16 KV Bus Undervoltage Relay had not been performed within the specified frequency of the Technical Specifications (TS). The time requirement for functional testing of the Division II 4.16 KV Bus Undervoltage Relay was exceeded on September 18, 1998, at 0517 hours. The cause of this event was inadequate software change management. The corrective actions for this event include: performing functional testing of the Division II 4.16 KV Bus Undervoltage Relay; performing a review of other surveillances to ensure that they had not exceeded their specified frequency; briefing personnel involved in schedule development on this event; correcting an error made to the Late Report; reviewing computer programs and reports used by Work Management for inclusion in the computer application management program; revising CPS No. 1011.06 to require that changes to computer generated reports be verified and validated prior to use; and training Work Week Managers, Surveillance Coordinators, Shift Managers, and System Planners on the roles, responsibilities, and interfaces related to the surveillance test program.

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

DESCRIPTION OF EVENT

On September 18, 1998, the plant was in Mode 4 (COLD SHUTDOWN), reactor [RCT] coolant temperature was being maintained between 95 and 115 degrees Fahrenheit (F), and reactor coolant pressure was atmospheric. At approximately 1100 hours, the Clinton Power Station (CPS) Surveillance Coordinator discovered that surveillance testing of the Division II 4.16 KV Bus Undervoltage Relay [RLY], as required by Technical Specification (TS) Surveillance Requirement (SR) 3.3.8.1.2, had not been performed and was past its late date. Further investigation discovered that the Limiting Condition for Operation (LCO) Actions were not being taken per LCO 3.3.8.1, "Loss of Power (LOP) Instrumentation," for the late surveillance. The Shift Manager (SM) was notified of this condition. The SM directed the performance of the missed surveillance and entered the actions of TS SR 3.0.3. TS SR 3.0.3 allows for a 24 hour delay in entering the conditions of an LCO if it is discovered that a surveillance was not performed within its specified frequency. On September 18, 1998, at 1420 hours, surveillance testing of the Division II 4.16 KV Bus Undervoltage Relay was completed satisfactorily and the SM exited TS SR 3.0.3. Condition Report 1-98-09-298 was written to investigate and track this issue to resolution.

Surveillance procedure CPS No. 9333.30, "Division II 4.16 KV Degraded Voltage Trip - Functional Test," satisfies the functional testing SR for the Division II 4.16 KV Bus Undervoltage Relay and is required to be performed every 31 days per TS SR 3.3.8.1.2. Surveillance procedure CPS No. 9333.30 had been satisfactorily completed on August 10, 1998, and had a scheduled due date of September 7, 1998. TS SR 3.0.2 establishes an allowance that the specified frequency for each SR is met if the Surveillance is performed within 1.25 times the frequency interval specified as measured from the previous performance or as measured from the time a specified condition of the frequency is met. Using this allowance, the 1.25 times the frequency date was exceeded on September 18, 1998, at 0517 hours, and the actions per LCO 3.3.8.1 were not taken.

During the investigation into this event it was discovered that surveillance procedure CPS No. 9333.30 was inappropriately scheduled to be performed on September 18, 1998. Surveillances at CPS are tracked by the Power Plant Maintenance Planning System (PPMPS) database. This database tracks the due date and late date of surveillances and is maintained by a Surveillance Coordinator. System Planners use the information contained in PPMPS to input surveillances into a scheduling program called Primavera Project Planner (P3). When the P3 schedule is issued, surveillances indicated on the schedule are performed by the appropriate maintenance department.

During schedule meetings in August and early September, the performance of surveillance procedure CPS No. 9333.30 was discussed in relationship to other planned activities for the month of September, and the scheduling of surveillance procedure CPS No. 9333.30 was changed several times. During the course of these schedule changes, the System Planner failed to ensure that the due date and late date for surveillance procedure CPS No. 9333.30 was not exceeded.

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On September 16, 1998, during a schedule look ahead meeting, Electrical Maintenance personnel identified that surveillance procedure CPS No. 9333.30 would need to be scheduled for September 17, 1998, or it would exceed its late date. On September 17, 1998, believing it was September 16, 1998, the System Planner added surveillance procedure CPS No. 9333.30 to the next day's schedule, September 18, 1998. As a result, surveillance procedure CPS No. 9333.30 was not performed prior to exceeding its late date.

Three procedures currently implement the CPS surveillance testing program, CPS No. 1011.00, "Surveillance Testing Program," CPS No. 1011.02, "Implementation and Control of Surveillance Testing," and CPS No. 1011.06, "Surveillance Tracking and Scheduling." Per the requirements of these procedures, the Surveillance Coordinators are responsible for the tracking and scheduling of routine surveillances. There are currently two Surveillance Coordinators at CPS. One has been in his position since June 1998, and the second individual (who had previous Surveillance Coordinator experience) was recalled to the group in August. On normal work days, the Surveillance Coordinators review the status of surveillances to ensure that there are no surveillances which have exceeded their due or late dates. This function is performed by reviewing a computer generated report called the Late Report. The Late Report is generated by PPMS and indicates all surveillances that have exceed their due date.

On September 14, 1998, an error was made when making a change to the Late Report. This error resulted in surveillances which had exceeded their due date, but not their late date, being moved to the end of the report. As a result of this unexpected change to the Late Report, the Surveillance Coordinator was unable to identify that surveillance procedure CPS No. 9333.30 was approaching its late date and on September 18, 1998, at 0517 hours, it went past its late date.

No automatic or manually initiated safety system responses were necessary to place the plant in a safe and stable condition. This event was not directly affected by other inoperable equipment or components.

CAUSE OF EVENT

The cause of this event was inadequate software change management. Human error and inadequate oversight lead to an error being made when changing the Late Report. Had this error not occurred, the Surveillance Coordinator would have identified that surveillance procedure CPS No. 9333.30 was approaching its late date and could have taken action to prevent this event from occurring.

CORRECTIVE ACTIONS

The immediate corrective action for this event was to perform surveillance procedure CPS No. 9333.30 to satisfy TS SR 3.3.8.1.2. Surveillance procedure CPS No. 9333.30 was completed satisfactorily on September 18, 1998, at 1420 hours.

A review was performed to determine if other surveillances had exceeded their late date because of the error made to the Late Report. No other surveillances were missed due to this error.

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The error made to the Late Report, which resulted in surveillances which had exceeded their due dates but not their late dates being moved to the end of the report, was corrected. An independent validation was performed to ensure the correct change was made to the report.

Personnel involved in schedule development including Work Week Managers, System Planners, and Surveillance Coordinators were briefed on this event.

CPS No. 1011.06 will be revised to require that changes to computer generated reports, used to assist in surveillance scheduling and tracking, be verified and validated prior to use.

Computer programs and reports used by Work Management will be identified, reviewed and added to the computer application management program as applicable.

Work Week Managers, Surveillance Coordinators, Shift Managers, and System Planners will be trained on the roles, responsibilities, and interfaces related to the surveillance test program.

ANALYSIS OF EVENT

This event is reportable under the provisions of 10CFR50.73 (a) (2) (i) (B) as an operation or condition prohibited by the Technical Specifications. Testing of the Division II 4.16 KV Bus Undervoltage Relay was not performed within the specified frequency of TS SR 3.3.8.1.2 and allowances provided by TS SR 3.0.2, and the Actions per LCO 3.3.8.1 were not met.

An assessment of the safety consequences and implications of this event has determined that this event is not safety significant. While surveillance testing in accordance with surveillance procedure CPS No. 9333.30 was not performed within its specified frequency for the Division II 4.16 KV Bus Undervoltage Relay, subsequent testing results were satisfactory. This indicates that the Division II 4.16 KV Bus Undervoltage Relay would have been capable of performing their safety functions during the time that the surveillance test had lapsed.

ADDITIONAL INFORMATION

No equipment or components failed during this event.

This is the third recent instance of a surveillance exceeding its late date without entering the actions of an applicable LCO. The other instances were reported in Licensee Event Reports (LERs) 1998-022 and 1998-024. This recent trend indicates a weakness in management oversight of the surveillance program. Counseling has been conducted with the appropriate supervision on management's expectations regarding oversight of the surveillance program. The initial corrective actions taken for the previous events involving missed surveillances were inadequate to prevent this occurrence. Additional barriers added to the surveillance scheduling process along with clarifying expectations on self checking addressed in this LER and LERs 1998-024-01 and 1998-022-00 should prevent future occurrences of missed surveillances.

For further information regarding this event, contact J. D. Wisher, Surveillance Coordinator, at (217) 935-8881, extension 3626.