

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
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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 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 NAME	DOCKET NUMBER
07	08	98	1998	024	01	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)									
POWER LEVEL (10) 000	20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)			
	20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)			
	20.2203(a)(2)(ii)		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
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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)	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

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

On July 8, 1998, at approximately 0630 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 Division II 4.16 KV Bus Undervoltage Relay was exceeded on July 5, 1998. The cause of this event was personal error. The immediate corrective action taken for this event was performance of surveillance procedure CPS No. 9333.30, "Division II 4.16 KV Degraded Voltage Trip - Functional Test." Performance of this surveillance procedure satisfies the functional testing requirements of TS Surveillance Requirement (SR) 3.3.8.1.2 for the Division II 4.16 KV Bus Undervoltage Relay. Additional corrective actions include briefing the individual involved in this event on the necessity to self check; revising CPS No. 1011.02, "Implementation and Control of Surveillance Testing," to clarify the responsibilities of the Supervisor of Scheduling; adding an additional Surveillance Coordinator position with previous experience to the Work Management Group; and revising CPS No. 1011.06, "Routine Surveillance Tracking and Scheduling," to clarify the expectation of reviewing the Late Report at least once on each normal work day.

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

DESCRIPTION OF EVENT

On July 8, 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 0630 hours, the Clinton Power Station (CPS) Surveillance Coordinator was reviewing completed surveillances and discovered the surveillance that performs 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. At approximately 0635 hours, 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 which allows for a 24 hour delay in entering the condition of an LCO if it is discovered that a surveillance was not performed within its specified frequency.

Surveillance procedure CPS No. 9333.30, "Division II 4.16 KV Degraded Voltage Trip - Functional Test," satisfies the functional testing Surveillance Requirements (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 May 28, 1998, and had a due date of June 24, 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 July 5, 1998, and the Actions per LCO 3.3.8.1 were not taken. On July 8, 1998, at approximately 1017 hours, surveillance procedure CPS No. 9333.30 was completed satisfactorily and the SM exited SR 3.0.3. Condition Report 1-98-07-057 was written to investigate and track this issue to resolution.

During the investigation into this event it was discovered that surveillance procedure CPS No. 9333.30 was not added to the work schedule, and therefore not performed prior to exceeding its late date. Surveillances at CPS are tracked by the Power Plant Maintenance Planning System (PPMS) database. This database identifies the due date and late date of surveillances and is maintained by a surveillance coordinator. When a surveillance is approaching its due date, a System Planner inputs the surveillance 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 shop.

The System Planner for the Auxiliary Power (AP) system was tasked with manually loading the information for surveillances into the P3 schedule. Failure to self check following completion of this task resulted in surveillance procedure CPS No. 9333.30 not being added to the P3 schedule. Because the surveillance was not included in the P3 schedule, maintenance personnel were unaware that the surveillance was coming due and the late date was exceeded on July 5, 1998.

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An additional barrier was also missed that could have prevented this event. The week that surveillance procedure CPS No. 9333.30 exceeded its late date, the Surveillance Coordinator was not at work due to illness. On normal work days, the Surveillance Coordinator reviews the status of surveillances to ensure that there is no surveillances which have exceeded their due or late dates. This function is performed by reviewing a computer generated report called the Late Report. No contingency plan had been developed by management to provide coverage for the Surveillance Coordinator during his absence, and therefore; this check was not performed.

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 personal error. The System Planner failed to self check after inputting surveillance data into the P3 schedule. A contributing cause for this event was insufficient management oversight of surveillance testing activities.

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 July 8, 1998, at approximately 1017 hours.

The individual involved in this event was briefed on the necessity to use self checking techniques to ensure that errors are identified and corrected in a timely manner.

The contributing cause of insufficient management oversight will be addressed by revising the responsibilities of the Supervisor of Scheduling in CPS No. 1011.02, "Implementation and Control of Surveillance Testing," to ensure adequate staffing of the Surveillance Coordinator position. The Work Management staff has also been increased by an additional Surveillance Coordinator with previous experience. Finally, CPS No. 1011.06, "Routine Surveillance Tracking and Scheduling," will be revised to require reviewing the Late Report at least once on each normal work day.

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 allowance provided by TS SR 3.0.2, and the Actions per LCO 3.3.8.1 were not met.

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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 performed satisfactorily. This indicated 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.

CPS has recently reported an event involving a missed surveillance test in Licensee Event Report (LER) 1998-022. In addition, during the investigation and resolution of this event, another event occurred where a surveillance was not performed within its specified frequency. This event is being reported in LER 1998-027. The causes for these events were determined to be personnel error and failure to self check. The initial corrective actions taken in response to the events described in LERs 1998-022 and 1998-024 were inadequate to prevent the event in LER 1998-027. Additional barriers added to the surveillance scheduling process along with clarifying management's expectations on self checking addressed in this LER and LERs 1998-022 and 1998-027 should prevent future occurrences of missed surveillances.

For further information regarding this event, contact J. D. Wisher, Surveillance Coordinator, Work Management, at (217) 935-8881, extension 3494.