James A. FitzPatrick
Nuclear Power Plant
268 Lake Road
P.O. Box 41
Lycoming, New York 13093

315-342-3840

New York Power Authority

Michael J. Colomb
Site Executive Officer

October 27, 1998
JAFP-98-0349

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Subject: **Docket No. 50-333**
LICENSEE EVENT REPORT: LER-98-011

Failure to Meet Drywell Continuous Atmosphere Monitoring System Technical Specifications Surveillance Test Requirements

Dear Sir:

This report is submitted in accordance with 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications."

There are no commitments contained in this report.

Questions concerning this report may be addressed to Mr. Gordon Brownell at (315) 349-6360.

Very truly yours,

MICHAEL J. COLOMB

MJC:GB:las
Enclosure

cc: USNRC, Region 1
USNRC, Project Directorate
USNRC Resident Inspector
INPO Records Center

NRC FORM 366 (6-1998) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104 EXPIRES 06/30/2001

Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the 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. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

LICENSEE EVENT REPORT (LER)

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

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TITLE (4)

Failure To Meet Drywell Continuous Atmosphere Monitoring System Technical Specifications Surveillance Test Requirements

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
									N/A	05000
09	29	98	98	011	00	10	27	98	FACILITY NAME: N/A	DOCKET NUMBER: 05000

OPERATING MODE (9)	N
POWER LEVEL (10)	100

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

	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)(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	TELEPHONE NUMBER (Include Area Code)
Mr. Gordon Brownell, Licensing Engineer	(315) 349-6360

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)			EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	YES (If yes, complete EXPECTED SUBMISSION DATE).	X NO				

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

On September 29,1998, during a review of the Radiation Protection (RP) Program, auditors identified that Technical Specifications (TS) surveillance requirements for the reactor coolant leakage detection systems Drywell Continuous Atmosphere Monitoring (CAM) System were not being met. Specifically, the scope and acceptance criteria of the once per three months frequency calibration test procedure did not encompass the entire instrument channel or include calibration of the full instrument range as defined in the TSs. At the time of the discovery, the reactor mode switch was in the RUN position and the plant was operating at approximately 100 percent rated power.

The cause for the deficient test procedure was poor managerial oversight of work performed by a contractor.

Scheduled corrective actions include: declaring both channels of the CAM System inoperable, obtaining periodic grab samples to monitor drywell activity, revising CAM System surveillance test procedures, retesting of the CAM System in accordance with TS requirements, conducting a root cause evaluation, and reviewing the results of the evaluation and lessons learned with Radiological and Environmental Services Department personnel.

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EIIS Codes in [ ]

EVENT DESCRIPTION

On September 29,1998, during the conduct of a scheduled Quality Assurance Department audit of FitzPatrick's Radiation Protection (RP) Program, it was identified that Technical Specifications (TS) surveillance requirements for the reactor coolant leakage detection systems [IJ] Drywell Continuous Atmosphere Monitoring (CAM) System [IL] were not being met. Specifically, the test scope and acceptance criteria contained in the procedure used to control TS required once per three months calibration frequency for the CAM System did not encompass the entire instrument channel or include calibration of the full instrument range as defined in TSs. At the time of the discovery, the reactor mode switch was in the RUN position and the plant was operating at approximately 100 percent rated power.

The Drywell CAM System utilizes a two-channel monitor to provide information on particulate and noble gas activities in the Drywell atmosphere. Two independent and redundant process lines detect airborne radioactivity. Each process line includes particulate, iodine, and gaseous detectors that have a controller, local audiovisual alarms, readout, and a commonly shared multipoint recorder. TS Table 4.6-2, "Minimum Test and Calibration Frequency for Continuous Atmosphere Monitoring System" requires that the air particulate and the gaseous activity analyzers be calibrated once per three month period.

Technical Specifications define channel calibration as the adjustment of channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The channel calibration shall encompass the entire channel, including the required sensor, alarm, display, and trip functions. The channel calibration may be performed by means of any series of sequential, overlapping, or total channel steps so that the entire channel is calibrated.

The Radiological and Environmental Services (RES) Department uses procedure RP-RESP-03.01, "Drywell Constant Air Monitor" to fulfill TS Table 4.6-2 calibration requirements. However, test methods and parameters contained in RP-RESP-03.01 do not meet instrument calibration requirements as defined. Once per three months, the particulate and gaseous detectors are "efficiency" calibrated using standard calibrated radiation sources to attain response efficiencies. This test measures only a partial range of the instrument and does not include alarm response verification.

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EVENT DESCRIPTION (cont.)

An electronic calibration, as defined by the TSs definition of an instrument channel calibration, however, is performed by the Instrument and Control(I&C) Department on two year frequency intervals within the I&C Preventive Maintenance (PM) Program. This test uses electronic inducted signals that test the full range of the instrument channel and verifies alarm response. This electronic calibration was last performed in January 1998.

EVENT CAUSE

In 1994, a surveillance test (ST) adequacy review was completed, which included RES Department procedures. Identified during the review was the condition that CAM surveillance tests may not have been in compliance with TS requirements. A procedure change request (PCR) was generated to recommend procedure revisions to establish TS compliance. The PCR was found unprocessed during the September 1998 RP Program audit.

The cause for the uncorrected calibration procedure was poor managerial oversight of work performed by a contractor. Specifically, there existed a lack of ownership by RES management over the work being completed by contracted personnel hired by the Authority to perform various RES Department technical support tasks. This resulted in:

- the failure to appropriately identify and report nonconforming conditions through the plant's Deviation and Event Report system, and

- inadequate communications as evidenced by the failure of RES supervision to be aware of potential TS concerns and the failure of the turnover process at the completion of the work assignment by the contractors prior to their exiting the plant. No historical data was found showing that the PCR was ever entered into the procedure change control process.

ANALYSIS

This report is being submitted in accordance with 10 CFR 50.73 (a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications."

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ANALYSIS (cont.)

TS Section 3.6, BASES, states that the reactor coolant leakage detection systems consist of the Drywell Sump Monitoring System and the Drywell CAM System. The CAM System supplements the Drywell Sump Monitoring System in detecting abnormal leakage that could occur from the Reactor Coolant System. The Safety Related function of detecting Drywell leakage is performed redundantly by the primary containment sump system and its alarm systems, and the Drywell temperature indication and alarm system. The Drywell CAM System is non-safety related and only acts as a backup to these systems.

Both channels of the CAM System were declared inoperable on October 01, 1998 following confirmation that TS calibration requirements were not being met. Operators immediately entered TS Section 3.6.D.6 Limiting Condition For Operation (LCO) which states that with the CAM System (gaseous or particulate analyzers) inoperable, plant operation may continue for up to 30 days provided grab samples of the containment atmosphere are obtained and analyzed at least once per 24 hours. As a result, the safety significance of this event was minimal.

CORRECTIVE ACTIONS

1. A root cause evaluation was completed for this event. This evaluation and lessons learned will be reviewed with RES Department personnel. **(Scheduled Completion Date - December 15, 1998)**

2. Subsequent to this 1994 event, FitzPatrick had issued Administrative Procedure AP-01.08, "Control Of Contractor and Vendor Activities". This procedure provides the requirements for the controls of contractor and vendor activities and guidelines for management expectations regarding contractor and vendor oversight.

3. Calibration activities for both channels of the CAM System's gaseous and particulate radiation monitors were successfully completed on October 09, 1998.

4. RES procedure RP-RESP-03.01 will be revised prior to its next scheduled test due date to: (1) include the full instrument range electronic calibration; and (2) verify radiation monitor alarm response.
(Scheduled Completion Date - December 15, 1998)

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CORRECTIVE ACTIONS (cont.)

5. RES Department will evaluate the results of other ST adequacy reviews conducted during the 1994 period to ensure inconsistencies and/or deficiencies previously identified have been resolved.
(Scheduled Completion Date - March 31, 1999)

ADDITIONAL INFORMATION

A. Previous similar Events:

LERs 97-009, 97-006, 95-014, 95-012 and 94-003 dealt with exceeding or not performing surveillance test at required frequencies. However, the causes for those previous occurrences were not similar, therefore, the corrective actions would not have precluded this event.

B. Extent of Condition:

An extent of condition review will be conducted by the RES Department of previous contractor activities associated with ST adequacy reviews as discussed in Corrective Action number 5. Additionally, other departments will also evaluate results of a select number previously conducted ST adequacy reviews to provide assurance that similar conditions do not exist.