NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
PLANT HATCH, UNIT 2	0 5 0 0 0 3 6 6	1 OF 0 5

TITLE (4)

INADEQUATE PROCEDURE RESULTS IN MISSED TECHNICAL SPECIFICATIONS SURVEILLANCE

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

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
POWER LEVEL (10)	1 0 0	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	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)(viii)(A)	
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Steven B. Tipps, Manager Nuclear Safety and Compliance, Hatch	AREA CODE 9 1 2 3 6 7 - 7 8 5 1

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)

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

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

On 9/20/88 at approximately 1300 CDT, Unit 2 was in the run mode at an approximate power level of 2436 CMWT (approximately 100 percent of rated thermal power). At that time, plant Nuclear Safety and Compliance personnel discovered some of the requirements of Unit 2 Technical Specifications section 4.3.6.5 were not contained in any approved plant procedure and, therefore, were not being implemented. Plant Operations personnel initiated a Limiting Condition for Operation (LCO) to ensure the requirements of Unit 2 Technical Specifications section 4.3.6.5 were met until the requirements could be included in a plant procedure.

The cause of this event was an inadequate procedure. Procedure 34GO-SUV-002-2S did not require a channel check of the Source Range Monitors (SRM EIIS code IG) when in the hot shutdown and cold shutdown modes as required by the Technical Specifications.

Corrective actions include initiating an LCO to ensure the Technical Specifications are met and issuing the upgraded procedure which contains the required channel check.

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

Plant and System Identification

General Electric - Boiling Water Reactor
Energy Industry Identification System codes are identified in the text as (EIIS Code XX).

Summary of Event

On 9/20/88, at approximately 1300 CDT, Unit 2 was in the run mode at an approximate power level of 2436 CMWT (approximately 100 percent of rated thermal power). At that time, plant Nuclear Safety and Compliance personnel discovered some of the requirements of Unit 2 Technical Specifications section 4.3.6.5 were not contained in any approved plant procedure and, therefore, were not being implemented. Plant operations personnel initiated a Limiting Condition for Operation (LCO) to ensure the requirements of Unit 2 Technical Specifications section 4.3.6.5 were met until the requirements could be included in an approved plant procedure.

Description of Event

On 9/20/88, plant Nuclear Safety and Compliance personnel were completing a comparison of Unit 1 and Unit 2 Technical Specifications surveillance requirements and the Technical Specification Surveillance Scheduling Program data base to ensure all surveillance requirements were on the data base and were scheduled at the proper frequency. The comparison was being performed as a follow up to the surveillance procedure portion of the plant's Procedure Upgrade Program (PUP) and in response to a site Quality Assurance Open Item. At that time, it was discovered the requirements of Unit 2 Technical Specifications section 4.3.6.5.a.1.(b) were not contained in any approved plant procedure. This specification requires that three (of four) Source Range Monitors (SRM EIIS Code IG) be demonstrated operable by performance of a channel check at least once per 24 hours when in the hot shutdown or cold shutdown modes (operating conditions 3 and 4, respectively).

Existing plant procedure 34GO-SUV-002-2S, "Surveillance Checks", requires the performance of a channel check of the SRMs only in the startup and refueling modes (operating conditions 2 and 5, respectively). This procedure will be replaced by a new upgraded plant procedure 34SV-SUV-019-2S, "Surveillance Checks", as part of the plant's PUP. The deficiency in the existing surveillance procedure was identified during the independent review by Nuclear Safety and Compliance personnel.

The new procedure, 34SV-SUV-019-2S, contains the requirements of Unit 2 Technical Specifications section 4.3.6.5.a.1.(b), but has not been issued (pending completion of the validation process for the procedure). No other currently approved plant procedure provides instructions for the performance of the SRM channel check in conditions 3 and 4. Plant Operations personnel initiated LCO 2-88-585 on 9/20/88 to require the performance of channel checks of the SRMs at least once per 24 hours when in the hot shutdown or cold shutdown modes until procedure 34SV-SUV-019-2S is effective.

Cause of Event

The root cause of the event is an inadequate procedure. The existing plant procedure, 34GO-SUV-002-2S, did not require a channel check of the SRMs in the hot shutdown and cold shutdown modes as required by the Unit 2 Technical Specifications. The procedure has been inadequate since 6/7/78 (Revision 1) when it was revised incorrectly to remove the requirement to perform the SRM channel check when in the hot shutdown and cold shutdown conditions. The reference to the Unit 2 Technical Specifications section 4.3.6.5 also was removed at that time. A review of the revision request package for the 6/7/78 revision revealed no specific reason for deletion of the channel check requirements or the Technical Specifications reference.

Reportability Analysis and Safety Assessment

This report is required per 10 CFR 50.73 (a)(2)(i)(B) because a condition existed that was prohibited by the plant's Technical Specifications. Specifically, the requirements of Unit 2 Technical Specifications section 4.3.6.5.a.1.(b) were not met. These requirements were not contained in any approved plant procedure and, therefore, were not being implemented.

The SRMs provide the operator with information on the status of the neutron level in the core at very low power levels during startup. At these low power levels, reactivity additions are not made without this neutron level information available to the operator. When the Intermediate Range Monitors (IRM EIIS Code IG) are on scale, adequate information is available without the SRMs. The SRMs provide signals to the Rod Block Monitor (RBM EIIS Code JD) to block control rod movement when neutron levels increase above a predetermined setpoint. The SRMs also provide signals to the Reactor Protection System (RPS EIIS Code JC) to initiate an automatic scram when neutron levels are above the setpoint; however, this trip is active only when the shorting links are removed during core alterations in the refueling mode (operating condition 5).

In the event addressed in this report, the SRMs were not being checked as required by the Technical Specifications when the reactor was in the hot shutdown and cold shutdown modes. In these modes, all control rods are inserted fully, the reactor is subcritical, and the reactor coolant temperature is 212 degrees Fahrenheit or greater while in hot shutdown, or less than 212 degrees Fahrenheit while in cold shutdown. No positive reactivity additions that would result in an increase in neutron level are made in these modes. Since all rods are fully inserted and no control rods are withdrawn in conditions 3 and 4, the SRMs actually are relied upon for a neutron monitoring function rather than a protective function. There is no need to provide a trip signal to the RPS because the reactor is not in the condition (the refueling mode with core alteration in progress) in which this protective feature is required. It should be noted that plant procedure 34GO-SUV-002-2S did require a channel check of the SRMs when in the startup and refueling modes where the SRMs do provide the safety functions described in this and the preceding paragraph.

Based on the above information, it is concluded this event had no adverse impact on nuclear safety. The event would not have been more severe had it occurred under other operating conditions because the required SRM checks were performed during those operating conditions where neutron level could change due to control rod movement or core alterations. Further, the SRMs are not required to be operable at higher power levels and are, in fact, withdrawn from the core at approximately 1% of rated thermal power.

Corrective Actions

Existing plant procedure 34GO-SUV-002-2S, will be replaced by a new procedure, 34SV-SUV-019-2S. The new procedure (34SV-SUV-019-2S), which contains the requirements of Unit 2 Technical Specification 4.3.6.5.a.1.(b), has been through the PUP process and has been validated. Currently, validation comments are being incorporated into the procedure. The new procedure will be issued by 11/15/88. In the interim, LCO 2-88-585 has been issued and will ensure the required SRM channel check is performed should the reactor enter the hot shutdown or cold shutdown mode before procedure 34SV-SUV-019-2S is effective.

The Procedures Upgrade Program personnel found and corrected this inadequate procedure (the procedure is still in the validation process and has not yet been issued). Additionally, administrative controls for procedure revisions are in place which should prevent inappropriate revisions of procedures in the future. Plant procedure 10AC-MGR-003-0S, "Preparation and Control of Procedures", requires a review of procedure revision requests that is very similar to the upgrade process review. Also, procedures 10AC-MGR-003-0S and 10AC-MGR-010-0S, "Preparation ar Approval of Safety Evaluations", require detailed safety evaluations for proposed procedure revisions. The safety evaluations must include the revision's effects on Technical Specifications requirements.

Additional Information

No systems other than the SRM system were effected by this event.

Similar events in which Technical Specifications requirements were not incorporated into plant procedures were reported in the following LERs: 50-366/1988-002, dated 3/18/88, 50-366/1988-010, dated 5/16/88, 50-366/1988-012, dated 5/23/88, 50-366/1988-014, dated 5/26/88, 50-366/1988-016, dated 6/24/88, and 50-321/1988-010 dated 6/22/88. Corrective actions for these events included revising the inadequate procedure and continuing with the plant's Procedures Upgrade Program. These corrective actions would not have prevented the event addressed in this report because different procedures were involved in the previous events and the Procedures Upgrade Program had not yet been completed.

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October 19, 1988

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

PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
LICENSEE EVENT REPORT
INADEQUATE PROCEDURE RESULTS IN MISSED
TECHNICAL SPECIFICATIONS SURVEILLANCE

Gentlemen:

In accordance with the requirements of 10 CFR 50.73(a)(2)(i), Georgia Power Company is submitting the enclosed Licensee Event Report (LER) concerning a condition that was prohibited by the plant's Technical Specifications. The event occurred at Plant Hatch - Unit 2.

Sincerely,

W. G. Hairston, III

CLT/ct

Enclosure: LER 50-366/1988-023

c: (see next page)

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Georgia Power

c: Georgia Power Company
Mr. H. C. Nix, General Manager - Plant Hatch
Mr. L. T. Gucwa, Manager Licensing and Engineering
GO-NORMS

U. S. Nuclear Regulatory Commission, Washington, D. C.
Mr. L. P. Crocker, Licensing Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II
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