NAC Form 19-831	366					LIC	ENSE	E EVE	NT RE	PORT	(LER)	U.S. NU	CLEAR REGULAT APPROVED OMB EXPIRES 8/31/86	ORY COMMISSION NO. 3150-0104	
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On 4/12/86 at 1010 CST, the plant entered Technical Specification (T/S) 3.0.3 upon discovery that both Intermediate Head Safety Injection (IHSI) trains were inoperable which is reportable per 10 CFR 50.73(a)(2)(i), 10 CFR 50.73(a)(2)(v), and 10 CFR 50.73(a)(2)(vii). The trains were restored to operability within one hour. The plant was in Mode 3, Hot Standby, at 0% power during the event.

The SI Pump Discharge to Cold Leg Injection Isolation valve, EM-HV-8835, was closed at 0402 CST on 4/12/86 for surveillance testing. The test was run when this valve was required to be open for emergency Cold Leg Injection. Upon discovery at 1010 CST on 4/12/86, the valve was re-opened. This test was inadvertently scheduled and performed in Mode 3 due to unintentional personnel errors.

Corrective actions include scheduling the test in Mode 4, Hot Shutdown, and initiation of progressive discipline for the specific individuals involved. Additionally, existing programmatic controls will be re-emphasized with the appropriate plant staff to prevent recurrence.

Other portions of the Emergency Core Cooling System (ECCS) were available, and IHSI could have been made immediately available manually by Operators at the Main Control Board if ECCS flow was required. At no time did this event endanger the public health and safety. TF, 22

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NRC Form 366A (9-83)	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION APPROVED OMB NO. 3150-0104 EXPIRES: 8/31/88											
FACILITY NAME (1)		DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)								
	Callaway Plant Unit 1	0 5 0 0 0 4 8 3	YEAR SEQUENTIAL NUMBER REVISIC 8 6 0 0 9 0 1	0 1 2 OF 0 1 5								
TEXT (If more spece is	required, use edditional NRC Form 365A's) (17)											
6.85	Date/Time of Event	Date/Time	of Discovery									
	0402 CST on 4/12/86	1010 CST	on 4/12/86									
1.11	Conditions at Time of Event and Discovery											
	Mode 3 - Hot Standby - Reactor Power 0%; Plant Heat-up in progress; RCS Temperature - 397°F.; RCS Pressure - 731 p.s.i.g.											
	Other Conditions Described											
	Mode 1 - Power Operation											
	Mode 2 - Startup											
-	Mode 4 - Hot Shutdown											
	Background and Description of Event											
	On 4/12/86 at 1010 CST, the plant entered Technical Specification (T/S) 3.0.3 upon discovery that both Intermediate Head Safety Injection (IHSI) trains of the Emergency Core Cooling System (ECCS) were inoperable. The trains were restored to operability within one hour.											
	Operation of the plant prohibited by the plant appropriate action per 10 CFR 50.73(a)(2)(v), via the Emergency Notif should have been made u made.	with both IHSI trains 's T/S's in Modes, 1, T/S 3.0.3 and reports and 10 CFR 50.73(a)(2 fication System (ENS) ander 10 CFR 50.72(b)	s inoperable is a con , 2, and 3 thus requi ing per 10 CFR 50.73(2)(vii). A four hour to the NRC Operation (2)(iii). This repor	dition ring a)(2)(i), report s room t was not								
	At 0402 CST on 4/12/86, surveillance procedure Injection Valve Operabi Two initial conditions while in Mode 4 with Re p.s.i.g. and 2) to close Isolation Hand Control operational and schedul procedure, a Temporary the test to be run in M	Operations personnel OSP-EP-V0003, "Section Weight and the sector of the	l commenced performan on XI Accumulator Saf T/S 4.0.5 every 18 mo 03 were: 1) to run t (RCS) pressure above to Cold Leg Injectio . Due to unintention associated with this was generated which a systems were made ope	tee of ety onths. this test a 300 on tal s allowed erable								

(4/11/86). Closing EM-HV-8835 in accordance with the procedure therefore, isolated the common line necessary for the SI pumps (3) to inject into four RCS Cold Legs during an emergency situation. The procedure was completed at 0558 CST on 4/12/86. Restoration of EM-HV-8835 to the oper position was not performed since it was not

NRC Form 366A (9-83)	LICENSEE EVENT REPO	AUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES: 8/31/88					
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TEXT (If more space is required, use additional NRC Form 395A's) (17)

included on the restoration checklist of OSP-EP-V0003. Restoration was not included in this procedure since it should have been performed in Mode 4 and the valve properly restored with a separate IHSI system procedural lineup performed for Mode 3 entry.

Immediate Action

The problem was discovered at 1010 CST on 4/12/86, when an operator performing the routine Control Room (CR) Shift and Daily Log Readings and Channel Checks, found EM-HIS-8835⁽⁴⁾ indicating closed. T/S 3.0.3 was immediately entered since T/S 3.5.2, ECCS Subsystems - Tavg greater than or equal to 350° F., does not provide Action Statements for two inoperable SI trains. EM-HV-8835 was restored to the open position within the one hour T/S 3.0.3 time constraint.

Root Cause

This event is an isolated case of unintentional utility personnel error during the scheduling, reviewing and running of OSP-EP-V0003. These errors and contributing factors are summarized as follows:

- Scheduling personnel identified OSP-EP-V0003 as required to be performed in Mode 3 prior to RCS pressure reaching 1000 p.s.i.g. which failed to recognize the Surveillance Task Sheet (STS) "Task Performance Mode" requirements. This "Task Performance Mode" required performance of the surveillance in Mode 4 ONLY.
- 2. The 4/12/86 Mode 3 change letter confused operating personnel. In an attempt to provide additional information to the CR, mode change letters have historically identified surveillances that will be due in the near future that would be affected by the mode change as well as surveillances required for the mode change. Surveillance tracking personnel identified OSP-EP-V0003 on the Mode 3 change letter to be performed in Mode 3 when conditions permit (RCS pressure greater than 300 p.s.i.g.). This was based on the need to perform the surveillance (18 month surveillance - due June 1986) prior to declaring the SI accumulators operable.
- 3. Operations personnel erroneously authorized performance of the OSP in Mode 3. During review of OSP-EP-V0003 prior to running the test, Operations personnel noted that the OSP initial conditions required performance of the procedure in Mode 4 only. They reviewed the OSP, mode change letter and schedule and erroneously authorized performance of the surveillance in Mode 3 by a TCN. This action was caused by the discrepancy between the schedule, initial conditions of the procedure, and the mode change letter. The schedule required

NRC Form 366A (9-83)	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION APPROVED OME NO. 3150-0104 EXPIRES: 8/31/58												
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performance prior to 1000 p.s.i.g. The mode change letter required the RCS to be greater than 300 p.s.i.g. Finally, the Operators overlooked the effect of closing EM-HV-8835 when in Mode 3.

 Kevision of the STS did not follow the existing review and approval cycle. With issuance of the TCN, the STS "Task Performance Mode" was changed by Operations personnel without the appropriate review and approvals.

Actions Taken to Prevent Recurrence

The following action to prevent recurrence items are numbered to correspond with those used in the Root Cause section above:

- For future outages, Outage Scheduling will schedule OSP-EP-V0003 in Mode 4 as a Mode 3 restraint.
 - (b) Progressive discipline has been initiated for appropriate Outage personnel. Outages Planning and Scheduling personnel have been advised concerning Outages involvement in this event.
 - (c) An Outages procedure currently in draft form will specifically address use of the STS "Task Performance Mode" for scheduling surveillances.
- Future mode change letters will reflect only required task performance conditions and T/S requirements for mode changes.
- 3.(a) The TCN that allowed performance of the OSP in Mode 3 was voided.
 - (b) Progressive discipline has been initiated for Operations personnel involved in this event and the necessity to comply with programmatic controls has been re-emphasized.
 - (c) Additional guidance will address the utilization of Temporary Change Notices for surveillance procedures. This guidance will be incorporated into plant administrative procedures.

 Management will re-emphasize the existing administrative controls for revisions to task sheets and surveillance procedures to appropriate plant personnel.

To correct the problem relative to failure to provide the four hour ENS notification, appropriate personnel will be advised of guidance concerning reporting items pursuant to 10 CFR 50.72(b)(2)(111).

NAC Form 368A (9-83)	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION									0.5	J.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES: 8/31/88							
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Safety Significance

Although the closure of EM-HV-8835 isolated the IHSI flowpath from the SI pumps to the RCS cold legs for approximately 6 hours, the SI pumps remained functional. Additionally, if a situation had occurred requiring IHS1, Operations Emergency procedure E.O calls for verification of SI pump start and flow. Steps require reverification of valve lineups if no flow is indicated. EM-HV-8835 can be opened from the Control Room. Other portions of the ECCS, which provide High Head and Low Head Safety Injection were available during the event. At the time of this event, the reactor had been shut down for approximately 42 days. EM-HV-8835 is routinely verified to be opened every shift while in Modes 1, 2, and 3. This operating routine minimizes the time EM-HV-8835 could have remained shut and remained undetected. The discovery of this event was by an operator performing this routine shift valve verification. At no time did this event endanger the public health and safety.

Previous occurrences: none

Footnotes

(1)	IEEE	Standard	805-1983	Systems	- BP,	BQ,	СВ
(2)	IEEF IEEF	E Standard E Standard	805-1983 803A-198	3 System 83 Compon	- BQ nent -	HCV	
(3)	IEEE IEEE	Standard Standard	805-1983 803A-1983	System 3 Compone	- BQ ent - 1	2	
(4)	IEEE IEEE	Standard Standard	805-1983 803A-198	System 3 Compon	- BQ ent - I	HIS	
(5)	IEEE	Standard	805-1983	System	- BQ		

IEEE Standard 803A-1983 Component - ACC

AMB



May 16, 1986

U. S. Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

ULNRC-1316

Gentlemen:

DOCKET NUMBER 50-483 CALLAWAY PLANT UNIT 1 FACILITY OPERATING LICENSE NPF-30 LICENSEE EVENT REPORT 86-009-01 INOPERABLE SAFETY INJECTION TRAINS DUE TO PERSONNEL ERROR

The enclosed Licensee Event Report is submitted to amend LER 86-009-00, transmitted via ULNRC-1307 dated 5/12/86, concerning operation of the Callaway Plant with a condition prohibited by the plant's Technical Specifications. The condition resulted from inoperability of both Intermediate Head Safety Injection Trains due to personnel errors and required entry into Technical Specification 3.0.3.

AZ Landolph

G. L. Randolph Manager, Callaway Plant

Me/drs Enclosure

cc: Distribution attached

MAY 1 9 1986

cc distribution for ULNRC-1316

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