

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) South Texas Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 9 8	PAGE (3) 1 OF 0 5
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TITLE (4)  
Entry Into Technical Specification 3.0.3 To Perform Surveillance Testing

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	4	2	4	8	8	8	8	8				0 5 0 0 0
0	4	2	4	8	8	0	2	9				0 5 0 0 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)

OPERATING MODE (9) 1	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(e)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input type="checkbox"/> 50.36(e)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(vii)(A)	
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(vii)(B)	
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)		

LICENSEE CONTACT FOR THIS LER (12)

NAME M.A. McBurnett - Licensing Manager	TELEPHONE NUMBER AREA CODE: 5 1 2 9 7 2 - 8 5 3 0
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS
E									

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 fifteen single space typewritten lines) (16)

On April 24, 1988 with Unit 1 in Mode 1 at 30% power, Technical Specification 3.0.3 was entered on two occasions for a total of seventeen minutes during testing of Steam Generator Power Operated Relief Valves (PORV's). The on duty licensed Shift Supervisor reviewed the Technical Specifications and bases and determined that he was in compliance for the conditions at that time. The Shift Supervisor was not informed of the NRC's concern regarding "voluntary entry" into Technical Specification 3.0.3. As a result of this event, procedures have been revised to prohibit "voluntary entry" into Technical Specification 3.0.3. pending NRC clarification of this issue.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

DESCRIPTION OF OCCURRENCE:

On April 24, 1988 with Unit 1 in Mode 1 at 30% power, Technical Specification (TS) 3.0.3 was entered on two occasions for a total of seventeen minutes during testing of Steam Generator Power Operated Relief Valves (PORV's).

On April 22, 1988 an Unreviewed Safety Question Evaluation (USQE) was prepared to address the continued operation of Unit 1 until the Steam Generator PORV's could be repaired (reference LER-88-027). The USQE imposed a group of tests and inspections to be performed daily on each PORV to ensure operability. These tests included measurement of the hydraulic pump cycle time, inspection for oil leakage and a stroke test. As a result of the required testing on April 23, 1988, PORV 1D was declared inoperable at 0130 hours, due to excessive pump cycling, which resulted in entry into TS 3.7.1.6 Action Statement a. (seven days to restore). On April 23 at 1930 hours, PORV 1A was tested and also declared inoperable. Two inoperable PORV's resulted in entry into Action Statement b. (72 hours to restore).

On April 24, 1988, while valves 1A and 1D were still out of service, the test which cycled valves 1B and 1C was required to be performed. This would result in three PORV's being rendered inoperable at one time which is not covered by TS 3.7.1.6. Therefore, the plant would either have to be shut down or TS 3.0.3 would have to be entered while the testing was performed.

The licensed Shift Supervisor evaluated the situation and chose to enter TS 3.0.3 for the following reasons:

1. The Technical Specification basis indicated that this would be an appropriate use of 3.0.3 as it was not a "routine" entry and there were no alternatives that would not result in redundant components being inoperable.
2. Testing of the PORV's requires approximately ten minutes.
3. It would not be prudent to maneuver the plant from 30% power to Residual Heat Removal (RHR) entry conditions in less than 8 hours.
4. Since PORV's are required to provide decay heat removal late in a natural circulation cooldown following a feedline break and a PORV isolated for testing could be unisolated before it was needed, isolation of a PORV would not expose the public to as great a risk as a rapid plant shutdown.

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DESCRIPTION OF OCCURRENCE (cont.):

At 1622 hours on April 24, 1988, TS 3.0.3 was entered for 8 minutes to verify the operability of PORV 1C. At 1633 hours, TS 3.0.3 was again entered for 9 minutes to verify the operability of PORV 1B. The Shift Supervisor was unaware that any entry into TS 3.0.3, per NUREG 1022 required the generation of an LER, as such, the event was not entered into the station problem reporting system at that time.

On May 1, 1988 with the Unit in Mode 1 at 30% power the same conditions of two PORV's inoperable occurred. Testing was required on valves 1C and 1D while valves 1A and 1B were out of service for repair. The licensed Shift Supervisor on duty at this time recalled training he had been provided regarding voluntary entry into the TS 3.0.3 and consulted plant management for guidance. The decision was made by Plant Management to shutdown and cooldown the plant. The plant entered Mode 3 at 2324 hours and Mode 4 at 0701 hours on May 2, 1988. Since the surveillance interval on valves 1C and 1D was exceeded at 0000 hours on May 2, 1988, the plant was in TS 3.0.3 for a period of seven hours, one minute during the cooldown. It was at this time that the failure to report the April 24, 1988 event was detected by HL&P personnel.

On May 31, 1988, HL&P requested, and was granted an extension of the due date for this LER to June 13, 1988 by Mr. Les Constable of NRC Region IV. This was required as a result of discussions held at an enforcement conference on May 26, 1988.

CAUSE OF OCCURRENCE:

At the time of this event the Shift Supervisor reviewed the Technical Specifications and bases and determined that his actions constituted an acceptable entry into TS 3.0.3 based on plant conditions.

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ANALYSIS OF EVENT:

Steam Generator PORV's are required to assist in mitigation of small break LOCA, feedwater line break, loss of feedwater, loss of offsite power and steam generator tube rupture accidents. This event resulted in only one PORV being available on two occasions for less than ten minutes each time. An operator was stationed at each valve under test to assure that it could be immediately returned to service if needed. There was no additional risk to the public due to this event.

Operation of the plant in a condition prohibited by Technical Specifications is reportable under 10CFR50.73(a)(2)(i).

CORRECTIVE ACTION:

The following corrective actions are being taken to prevent recurrence of the event:

1. The operations supervisor issued a night order on May 2, 1988 prohibiting intentional entry into TS 3.0.3 to perform testing or maintenance.
2. The Plant Manager met with the Unit 1 Shift Supervisors on May 11, 1988 to discuss the event and ensure proper understanding of entry into TS 3.0.3.
3. Plant management has issued instructions to operations personnel regarding entries into TS 3.0.3. These instructions prohibit voluntary entry into TS 3.0.3 and outline reporting and restoration requirements following forced entries into TS 3.0.3.
4. A Technical Specification interpretation on this subject was prepared on May 12, 1988.
5. The Plant Conduct of Operations Procedure, OPGP03-ZO-0004, has been revised to reflect that voluntary entry into TS 3.0.3 is not permitted.
6. Should the need to voluntarily enter TS 3.0.3 occur outside of 10CFR50.54(x), HL&P will contact NRC Region IV to request discretionary enforcement.
7. A request has been made that NRC provide formal clarification on voluntary entry into TS 3.0.3. (ST-AL-AE-2676 dated May 31, 1988). The above actions are subject to revision pending NRC's response to the May 31, 1988 letter.

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

ADDITIONAL INFORMATION:

No previous events have occurred at STPEGS regarding voluntary entry into TS 3.0.3.

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# The Light company

Houston Lighting & Power

P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

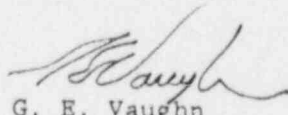
June 13, 1988  
ST-HL-AE-2651  
File No.: G26  
10CFR50.73

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

South Texas Project Electric Generating Station  
Unit 1  
Docket No. STN 50-498  
Licensee Event Report 88-029 Regarding  
Entry Into  
Technical Specification 3.0.3. to Perform Surveillance Testing

On April 24, 1988, Houston Lighting & Power (HL&P) Operations Department personnel entered Technical Specification 3.0.3 for a total of seventeen (17) minutes during testing of Steam Generator Power Operated Relief Valves. The event did not have any adverse impact on the health and safety of the public. In accordance with 10CFR50.73, HL&P submits the attached Licensee Event Report (LER 88-029). As a result of discussions held at an enforcement conference on May 26, 1988, HL&P requested, and was granted an extension of the due date for this LER to June 13, 1988 by Mr. Les Constable of NRC Region IV.

If you should have any questions on this matter, please contact Mr. M. A. McBurnett at (512) 972-8530.



G. E. Vaughn  
Vice President  
Nuclear Plant Operations

GEV/BEM/cr

Attachment: Licensee Event Report 88-029  
Regarding Entry Into Technical  
Specification 3.0.3

cc:

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