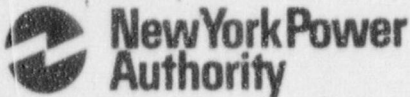


James A. FitzPatrick
Nuclear Power Plant
P.O. Box 41
Lycoming, New York 13093
315-342-3840



Michael J. Colomb
Site Executive Officer

July 16, 1997
JAFP-97-0247

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: LFR-97-006

**Instrumentation Isolation Trip Function Surveillance Test Not Performed At
Required Frequency**

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 J. Brownell at (315) 349-6360.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Michael J. Colomb'.

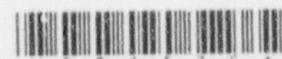
MICHAEL J. COLOMB

MJC:GJB:las
Enclosure

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

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NRC FORM 366 (4-95)			U.S. NUCLEAR REGULATORY COMMISSION			APPROVED BY OMB NO. 3150-0114 EXPIRES 04/30/98 <small>ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 60.0 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-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20556-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.</small>				
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits, characters for each block)										
FACILITY NAME (1) James A. FitzPatrick Nuclear Power Plant						DOCKET NUMBER (2) 05000333		PAGE (3) 01 OF 05		
TITLE (4) Instrumentation Isolation Trip Function Surveillance Test Not Performed At Required Frequency										
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
06	16	97	97	-- 006	-- 00	07	16	97	N/A	05000
OPERATING MODE (9) N		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)								
POWER LEVEL (10) 100		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 Mr. Gordon J. Brownell, Licensing Engineer						TELEPHONE NUMBER (Include Area Code) (315) 349-6360				
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs
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)										
<p>On June 16, 1997, while performing a review of the Instrument and Controls (I&C) Department Surveillance Test Program, an I&C supervisor discovered that certain Primary Containment Isolation System instrument channel response time tests required per Technical Specifications (T.S.) had not been performed within the T.S. required surveillance test interval. T.S. Section 4.2.A requires a once per 24 month response time test of one trip channel in each trip system. This interval (including a 25 percent extension period allowed by T.S. 4.0.B) was found to have been exceeded. At the time of the discovery, the mode switch was in the RUN position with the plant operating at 100 percent rated power.</p> <p>The cause for the missed surveillances was personnel error due to less than adequate scheduling of instrument surveillance test requirements.</p> <p>Corrective actions include: satisfactory completion of the surveillance tests, a review of the I&C surveillance test schedule against T.S. response time testing surveillance requirements to ensure the schedule was current and no other surveillance test had been missed, revising both the Surveillance Test Program schedule and associated Instrument Surveillance Procedures, and conducting briefings on the details and lessons learned from this event.</p>										

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

EIIS Codes are in []

EVENT DESCRIPTION

On June 16, 1997, while performing a review of the Instrument and Controls (I&C) Department Surveillance Test Program, an I&C supervisor discovered that certain Primary Containment Isolation System (PCIS) [JM] instrument channel response time tests required per Technical Specifications (T.S.) Section 4.2.A, Primary Containment Isolation Functions, and controlled per Instrument Surveillance Procedures ISP-103, "PCIS Group 1 Isolation Reactor Level Instrument Response Time Test (ATTS)" and ISP-106, "Main Steam Isolation Valve (MSIV) [SB] Closure High Steam Line Flow Response Time Test", had not been performed within the T.S. required surveillance test interval. T.S. Section 4.2.A requires a once per 24 months response time test of one trip channel in each trip system and all channels in both trip systems are to be tested within two test intervals (48 months).

The review identified that the 24 months response time test interval, including the 25 percent extension period allowed by T.S. Section 4.0.B, had been exceeded for: (1) two of four Reactor Low-Low-Low Water Level instrument channels, and (2) eight of sixteen Main Steam Line High Flow instrument channels.

A further review determined that all trip channels had met the 48 months T.S. test interval requirement.

CAUSE OF EVENT

The cause for the failure to complete Instrument Surveillance Procedures ISP-103 and ISP-106 within the T.S. required interval was personnel error due to less than adequate scheduling of instrument surveillance test requirements by the I&C surveillance test coordinator following the implementation of a T.S. amendment.

In September 1992, T.S. Amendment No. 183 was issued and included response time testing (RTT) requirements for MSIV actuation instrumentation. The amendment required that one trip channel in each trip system be tested during an 18-month interval and that all trip channels of each trip system be tested within two test intervals (36 months). Surveillances included testing of the sensor which required a plant outage. New Instrument Surveillance Procedures were developed to support testing of the trip functions and all associated MSIV RTT surveillance tests were completed in their entirety. The Instrument Surveillance Test Program was revised in November 1992 to add the RTT requirements using 18-month test intervals.

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CAUSE OF EVENT (cont.)

In March 1994, Surveillance Test Program records were revised again to schedule the testing of one trip channel in each trip system (i.e., PCIS trip channels A1/B2 and A2/B1) every 18 months. The intent was to alternately perform tests in each refuel outage while meeting T.S. requirements. This revision to the Test Program did not, however, contain controls to assure that when subsequent scheduled test dates were revised, both test records were appropriately adjusted to assure T.S. required test intervals were maintained.

RTTs for PCIS logic A1/B2 were performed during the March 1994 Maintenance outage, which was the first test interval. RTTs for PCIS logic A2/B1 were scheduled for August 1995 which was the second test interval. RTTs for PCIS logic A2/B1 were rescheduled and completed in December 1994 during refuel outage 12. They were performed approximately 8 months early because they would not reach the next scheduled outage date of November 1996.

The I&C Surveillance Test Program contained one each record for PCIS logic A1/B2 and A2/B1. The computerized scheduling system does not communicate between records. When the I&C surveillance test coordinator updated A2/B1 following the December 1994 performance, he failed to manually reschedule the A1/B2 logic test to ensure performance during the next required test interval of 18 months.

In October 1996, T.S. Amendment No. 233 was approved to extend the plant operating cycle to 24 months. Schedule changes resulting from the increased operating cycle (18 months to 24 months), which added 6 months to the test interval, also failed to identify the test scheduling error for logic A1/B2.

ANALYSIS

This event is reportable in accordance with 10 CFR 50.73 (a)(2)(i)(B), which requires Licensees to report "any operation or condition prohibited by the plant's Technical Specifications". The T.S. required response time test frequency for Main Steam Isolation Valve actuation instrumentation is once per 24 months plus a 25 percent extension period allowed by T.S. Section 4.0.B.

Periodic response time testing of the MSIV actuation instrumentation isolation trip units is performed to demonstrate that they are capable of performing their intended functions. The testing of at least one channel in each trip system every 24 months provides this assurance. Following completion of the subject response time tests per ISP-103 and ISP-106 on June 17, 1997, no deficiencies or unsatisfactory conditions were found.

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ANALYSIS (cont.)

This event was not safety significant. The satisfactory completion of ISP-103 and ISP-106 demonstrated that in the event of valid Reactor Low-Low-Low Water Level signal or High Steam Line Flow signal, the system would have functioned as designed. In addition, redundant instrumentation associated with the trip functions was operable with up-to-date surveillances.

CORRECTIVE ACTIONS

1. The missed surveillance response time tests contained in Instrument Surveillance Procedures ISP-103 and ISP-106 were successfully performed.
(Complete - June 17, 1997)
2. A review was completed of the I&C surveillance test schedule against Technical Specifications response time testing surveillance requirements to ensure testing requirements were current and up-to-date. No discrepancies were identified as a result of the review.
(Complete - June 16, 1997)
3. The I&C Surveillance Test Program schedule was revised to require T.S. response time tests to be individually recorded.
(Complete - July 01, 1997)
4. The Instrument Surveillance Procedures associated with the T.S. response time test requirements will be revised to reflect the changes to the Surveillance Test Program. The revisions to the Test Program and Surveillance Test Procedures will eliminate the potential for future similar scheduling errors and maintain required T.S. test intervals.
(Scheduled completion date - September 15, 1997)
5. The I&C surveillance test coordinator responsible for the scheduling errors has been counseled.
(Complete - June 17, 1997)
6. Other department surveillance coordinators will be briefed on the details of this event and the lessons learned.
(Scheduled completion date - August 01, 1997)
7. Other Technical Specifications with comparable scheduled surveillance requirements will be reviewed to assure that similar surveillance scheduling errors can not be made.
(Scheduled completion date - August 15, 1997)

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

ADDITIONAL INFORMATION

- A. Failed Component - NONE
- B. Previous Similar Events: LERs 95-014, 95-012, 94-003, 93-016, 93-11, 92-020 and 90-008 described events in which T.S. required surveillance tests were missed. However, the causes for those previous occurrences were not similar, therefore, the corrective actions taken would not have precluded this event.