

LICENSEE EVENT REPORT (LER)

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

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 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 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Prairie Island Nuclear Generating Plant Unit 1		DOCKET NUMBER (2) 05000 282	PAGE (3) 1 OF 4
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TITLE (4)
TITLE

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
11	03	98	98	-- 17 --	00	12	03	98	Prairie Island Unit 2	05000 306
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)									
POWER LEVEL (10) 100	20.2201(b)	20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	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 Jeff Kivi	TELEPHONE NUMBER (Include Area Code) 651-388-1121
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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)

YES (If yes, complete EXPECTED SUBMISSION DATE).	<input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION	MONTH	DAY	YEAR

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

On November 3, 1998, Prairie Island personnel identified a deficiency in the plant's surveillance testing program for specific plant protection functions required during certain shutdown conditions. At the time Unit 1 was at Cold Shutdown due to maintenance required from a 10/29/98 Reactor Trip and Unit 2 was operating at 100% power.

Prairie Island personnel identified that during a non-refueling outage, no surveillance procedure existed to test the Source Range High Flux Reactor Trip Logic function. This is contrary to Technical Specification TS.4.1-1A.

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

EVENT DESCRIPTION

During the Prairie Island Nuclear Generating Plant (PINGP) Unit 2 Forced Outage of February 1998, a concern was raised when the normal monthly at-power reactor trip logic test became due with the plant at cold shutdown conditions. No procedure exists at the PINGP to test the reactor protection¹ logic in this plant condition (except for time response testing which only tests limiting reactor trips). As a hot shutdown reactor protection logic test did exist, PINGP staff determined the control rod drive system would not be made capable of rod withdrawal until after the reactor trip logic test at hot shutdown could be performed to satisfy Technical Specification Table TS.3.5-2A requirements. PINGP's normal practice during heat-up has been to maintain shutdown control rod banks² withdrawn. Therefore, management issued a Management Action Tracking Item to research reactor protection trip testing requirements and implement actions to allow future heat-ups with shutdown rods withdrawn.

PINGP engineering staff reviewed these requirements and concluded that a new surveillance procedure was required to test only the source range high flux reactor trip and associated logic and trip breakers³ during shutdown conditions when the control rod drive system was capable of rod withdrawal. This testing is satisfied by existing procedures for normal refueling outages. For forced outages where the plant remains at hot shutdown, the hot shutdown logic test procedure satisfies the surveillance requirements, but it is not specifically required to be performed unless the at-power reactor trip logic test is due. PINGP engineering staff initiated Procedure Change Additions to institute the new procedure requirements. No plant conditions were identified where these tests were required but not performed.

On November 3, 1998, PINGP engineering personnel presented a proposed test to the onsite safety review committee (OC) to perform the required reactor trip logic test during the current Unit 1 forced outage. This procedure was approved, but the OC questioned if the plant had been in a condition in the past where the surveillance was required, but had not been performed. No specific instance (of the plant having been in this condition and not having performed the required surveillance test) has been identified. However, it is believed that the plant has been in a condition since implementation of the Technical Specification requirements, when the monthly at power logic test was not performed prior to rod withdrawal as required by Technical Specifications. Therefore, this event is being reported under 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the PINGP Technical Specifications.

¹ (EIS System Identifier: JC)² (EIS System Identifier: AA)³ (EIS Component Identifier: BKR)

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CAUSE OF THE EVENT

The shutdown testing requirements for the source range high flux trip and reactor trip breakers was added to the PINGP Technical Specifications per License Amendments No. 111 and 104. Prior to this time shutdown testing requirements were not specified in the PINGP Technical Specifications. These changes were approved on August 24, 1994. When these License Amendments were implemented, PINGP personnel considered only refueling outages when determining testing changes and requirements. The failure to apply these testing requirements to the source range high flux reactor trip and associated logic and reactor trip breakers during any shutdown conditions was due to an oversight.

ANALYSIS OF THE EVENT

Testing of the source range high flux trip function during the present Unit 1 forced outage and during the Unit 2 forced outage in February 1998, confirmed that the equipment was fully capable of performing its safety function. The PINGP safety analyses consider the power range low setpoint high flux reactor trip as providing protection for startup transients, the source range high flux reactor trip is considered a backup reactor trip for this function. Therefore we conclude this event had minimal potential for impact on the health and safety of the public.

On November 3, 1998, the PINGP OC found that no specific instance (of the plant having been in this condition and not having performed the required surveillance test) has been identified. However, it is believed that the plant has been in a condition since implementation of the Technical Specification requirements, when the monthly at power logic test was not performed prior to rod withdrawal as required by Technical Specifications. Therefore, this event is being reported under 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the PINGP Technical Specifications.

CORRECTIVE ACTION

1. A procedure was developed and performed to test the source range high flux trip function for the current PINGP Unit 1 forced outage.
2. Technical Specification Tables T.S.4.1-1A, B and C were reviewed for other instrumentation required to be tested at other than refueling intervals. No other instrumentation was identified that is not tested per existing surveillance procedures.
3. ***Permanent plant procedures will be developed to test the source range high flux reactor trip at shutdown conditions for both units by March 31, 1999.***

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FAILED COMPONENT IDENTIFICATION

None.

PREVIOUS SIMILAR EVENTS

The PINGP has previously issued several LER's for failure to perform surveillance testing required by the Technical Specifications, but none of these events involved a failure to test equipment specifically during shutdown conditions other than refueling.