

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: 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 20545-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Clinton Power Station		DOCKET NUMBER (2) 05000461	PAGE (3) 1 OF 3
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TITLE (4)
Failure to Follow a Plant Procedure When Erecting Scaffold Results in a Safety-Related Area Cooler Becoming Inoperable Due to Seismic Qualification Concerns

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	13	97	97	029	00	12	15	97	None	05000
									None	05000

OPERATING MODE (9) 4	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)									
	20.2201(b)		20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	50.73(a)(2)(i)		50.73(a)(2)(viii)			
POWER LEVEL (10) 000	20.2203(a)(1)		20.2203(a)(3)(i)	<input checked="" type="checkbox"/>	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 if 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 R. A. Matthews, Project Specialist	TELEPHONE NUMBER (Include Area Code) (217) 935-8881, Extension 3188

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).	<input checked="" type="checkbox"/>	NO					

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

On November 13, 1997, Illinois Power (IP) personnel were investigating an issue where a scaffold was found partially supported by the Low Pressure Core Spray (LPCS) [BO] room area cooler, 1VY01S [CLR]. The effect that this scaffold had on the room cooler could not be positively determined; therefore, the room cooler was concluded to be inoperable due to seismic qualification concerns. The 1VY01S room cooler is a support component for the LPCS system, therefore, inoperability of the room cooler causes the LPCS system to be inoperable. The scaffold was built in November, 1994, to perform preventive maintenance on the 1VY01S room cooler. Because of radiation dose rates in the area (but without proper consideration given to the impact of the scaffold), a decision was made to leave the scaffold up for future use to reduce worker radiation exposure. The cause for this event was a failure to comply with CPS procedure 8901.10, "Scaffold Erection/Use/Dismantling." The corrective actions for this event include modifying the scaffold in accordance with CPS procedure 8901.10 to ensure it does not affect the seismic qualification of plant equipment, briefing appropriate personnel on this incident and CPS procedure 8901.10, and performing a walkdown of existing scaffolds to ensure the requirements of CPS procedure 8901.10 are met.

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TEXT CONTINUATION

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Clinton Power Station	05000461	97	029	00	2 OF 3

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

DESCRIPTION OF EVENT

On October 29, 1997, at approximately 1310 hours, it was discovered that one of the legs of a scaffold erected in the Low Pressure Core Spray [BO] room was being supported by the 1VY01S room cooler [CLR]. The purpose of this room cooler is to maintain the environmental qualification of LPCS room components. Failure of the room cooler could result in LPCS room atmospheric conditions exceeding design limitations, thus potentially preventing the LPCS system from performing its safety function. Condition Report 1-97-10-535 was written to investigate and track this issue, and on October 30, 1997, the scaffold was modified to ensure the seismic qualification of the area cooler was not compromised. During the investigation into this event it was determined that the Nuclear Station Engineering Department (NSED) had not approved this condition as required by Clinton Power Station (CPS) procedure 8901.10, "Scaffold Erection/Use/Dismantling." NSED could not positively determine the effect that this scaffold had on the 1VY01S room cooler; therefore, on November 13, 1997, they conservatively concluded that this condition caused the room cooler to be inoperable.

The scaffold was originally built in November 1994. At that time the plant was in Mode 1 (Power Operation), at approximately 100 percent power. The scaffold was erected for performing preventive maintenance (PM) task PTEVYA001 on the 1VY01S room cooler. Because of radiation dose rates in the area, a decision was made to leave the scaffold up for future use to reduce worker radiation exposure.

In response to this event, no automatic or manually initiated safety system responses were necessary to place the plant in a safe and stable condition. This event was not affected by other inoperable equipment or components.

CAUSE OF EVENT

The cause of this event was failure to comply with CPS Procedure 8901.10, "Scaffold Erection/Use/Dismantling." This procedure requires that a minimum clearance be maintained between scaffolding and plant equipment without NSED approval. This procedural requirement was not followed when building the scaffold in the LPCS pump room.

CORRECTIVE ACTIONS

The scaffold being partially supported by the LPCS room cooler was modified in accordance with CPS Procedure 8901.10 to ensure the seismic qualification of plant equipment. A walk-down will be performed to ensure existing scaffolds meet the requirements of CPS procedure 8901.10. Appropriate personnel will be briefed on this incident and CPS procedure 8901.10.

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ANALYSIS OF EVENT

This event is reportable under the provisions of 10CFR50.73 (a) (2) (i) (B) and 10CFR50.73 (a) (2) (ii) (B). Operable-Operability as defined by the Technical Specifications requires that a system, subsystem, division, component, or device shall be operable or have operability when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, division, component, or device to perform its specified safety function(s) are also capable of performing their safety-related support function(s). The 1VY01S LPCS room cooler provides a support function for the LPCS system. Because the scaffold resting on the room cooler rendered the 1VY01S room cooler inoperable due to seismic qualification, the LPCS system was outside its design basis and inoperable for approximately 3 years. Additionally, the Required Action under Technical Specification Limiting Condition for Operation 3.5.1 for an inoperable ECCS injection/spray subsystem requires that operability be restored within 7 days. Because the scaffold was not identified as causing the LPCS system to be inoperable, this action was not taken.

This event has potential safety significance. During a seismic event, in conjunction with a Loss of Coolant Accident (LOCA), it is possible that the 1VY01S room cooler could be damaged and rendered inoperable. Failure of the room cooler could result in LPCS room atmospheric conditions exceeding design limitations preventing the LPCS system from performing its safety function.

ADDITIONAL INFORMATION

No equipment or components failed during this event.

Illinois Power has not reported in recent history an event involving a scaffold causing equipment to be declared inoperable due to seismic qualifications. However, a Notice of Violation was issued in inspection report 50-461/97011 for CPS procedure 8901.10, "Scaffold Erection/Use/Dismantling," not specifying the performance of an appropriate stress analyses when attaching scaffolding to the minimum flow line piping for the "B" residual heat removal (RO) pump. In response to this violation, IP performed a walkdown of existing scaffolds but the scaffold affecting the operability of the LPCS room cooler was not identified.

For further information on this event contact Richard Matthews, Project Specialist, at (217) 935-8881, extension 3188.