

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Nine Mile Point Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 4 1 0	PAGE (3) 1 OF 0 3
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TITLE (4)
Technical Specification Violation - 4 SRM Downscale Channels Jumpered For Two Hours

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)
11	04	86	86	002	00	12	04	86	N/A		0 5 0 0 0
									N/A		0 5 0 0 0

OPERATING MODE (9) 5

POWER LEVEL (10) 0 0 0

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

20.402(b)	20.405(a)(1)(i)	20.405(a)(1)(ii)	20.405(a)(1)(iii)	20.405(a)(1)(iv)	20.405(a)(1)(v)	20.406(c)	50.36(c)(1)	50.36(c)(2)	50.73(a)(2)(i)	50.73(a)(2)(ii)	50.73(a)(2)(iii)	50.73(a)(2)(iv)	50.73(a)(2)(v)	50.73(a)(2)(vi)	50.73(a)(2)(vii)(A)	50.73(a)(2)(viii)(B)	50.73(a)(2)(ix)	73.71(b)	73.71(e)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
									X											

LICENSEE CONTACT FOR THIS LER (12)

NAME Robert G. Randall, Supervisor Technical Support	TELEPHONE NUMBER 3 1 5 3 4 9 1 - 2 4 4 5
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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
A	IIG	JII	G0310	N					

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)

ABSTRACT

On November 4, 1986, Nine Mile Point Unit 2 was in its initial fuel loading process with the mode switch in refuel. To satisfy Technical Specification requirements, surveillance procedure N2-OSP-RMC-W0002 was to be performed by Operations personnel at approximately 0210 hours. N2-OSP-RMC-W0002, "Reactor Mode Switch Functional Test of Refuel Interlocks" requires the pulling of selected control rods to notch-02, movement of the refueling platform towards the core, and subsequent verification of refuel interlocks. To comply with procedure prerequisite, "no rod blocks present", jumpers were installed by a licensed NMPC operator to clear SRM downscale rod blocks. The jumpers placed all four Source Range Monitors (SRM) downscale channels in a "bypassed" state and NMP2 in a "limiting condition of operation". Per Technical Specification Table 3.3.6-1 "Control Rod Block Instrumentation", the minimum number of operable SRM downscale channels is 2 in reactor mode 5. LCO 3/4 3.6.b, action item 61b states: with the number of operable channels two or more less than required by the minimum operable channels per trip function requirement, place at least one inoperable channel in the tripped condition within one hour. N2-OSP-RMC-W0002 lasted over two hours thereby violating plant Technical Specifications.

Corrective Action
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A Temporary Change Notice (TCN) has been issued providing procedural additions to N2-OSP-RMC-W0002 to prevent similar Technical Specification violations.

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

On November 4, 1986, Nine Mile Point Unit 2 was in its initial fuel loading process with the mode switch in refuel. To satisfy Technical Specifications surveillance requirements 4.9.1.2 and 4.9.1.3, procedure N2-OSP-RMC-W@002 was to be performed by Operations personnel at approximately 0210. N2-OSP-RMC-W@002, "Reactor Mode Switch Functional Test of Refuel Interlocks" requires the pulling of selected control rods to notch-02, movement of the refueling platform towards the core and subsequent verification of refuel interlocks.

To comply with procedure prerequisite 6.8 "no rod blocks present", jumpers were installed by a licensed NMPC operator at panels PNL606A and PNL633D to clear SRM downscale rod blocks. (Jumper Log - Index No. 574) Clearing all rod blocks is essential in that rod blocks are generated and verified in the test.

Since the core was not fully loaded, 3 of the 4 SRMs (in the unloaded portions of the core) were reading downscale and providing a rod block signal. The jumpers placed all four SRM downscale channels in a "bypassed" state and NMP2 in a "limiting condition of operation". Per Technical Specification Table 3.3.6-1 "Control Rod Block Instrumentation" the minimum number of operable SRM channels is "two" in reactor mode 5. LCO 3/4 3.6.b, action item 61b states: with the number of operable channels two or more less than required by the minimum operable channels per trip function requirement, place at least one inoperable channel in the tripped condition within one hour.

Involved personnel, unaware of Technical Specification 3/4 3.6.b, action item 61b, ran N2-OSP-RMC-W@002 for over two hours thereby violating Technical Specifications. The Technical Specification violation was not identified immediately but at a later date during the test review. The proper course of action would have been to place jumpers only on the three SRMs in the unloaded portion of the core, as SRM B was above the downscale and rod block setpoint. This would have placed the plant in a 7 day LCO rather than a 1 hour LCO, allowing sufficient time to complete the surveillance.

Cause of Event

In summary, the cause of the Technical Specification violation was two fold in nature:

- 1) Human error in that the NMPC senior licensed operator did not review the correct Technical Specification when approving the jumper installation.
- 2) A procedure deficiency in that N2-OSP-RMC-W@002, an approved procedure, did not include a reference to the violated Technical Specification. Nor did the procedure provide direction in jumpering individual SRM downscale channels for the less than fully loaded core condition, as it was not written considering the special conditions of initial fuel load.

There were no inop structures, components or systems that contributed to the event.

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		8 6	- 0 0 2	- 0 0	0 3	OF 0 3

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

Analysis of Event

There were no adverse safety consequences as a result of the event described in LER 86-02. All control rods were maintained fully inserted throughout the test except for single rod movements to notch-02. There were also no fuel moves or core alterations that occurred (or could occur) during the performance of N2-OSP-RMC-W@002. SRM indication was fully available in the control room throughout the duration of the test. LER 86-02 is being reported due to violation of Technical Specification 3.3.6-1.

Corrective Action

A Temporary Change Notice (TCN) to N2-OSP-RMC-W@002 has been issued per AP-2.0. The TCN is valid until the next revision of N2-OSP-RMC-W@002 and should prevent similar Technical Specification violations with the following procedural additions:

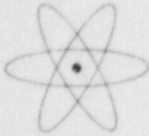
- 1) A caution statement to the SSS to verify all Technical Specification requirements for operable SRMs are met (including control rod block instrument).
- 2) A table showing the correct application points to bypass individual SRM downscalers. (only when required)
- 3) A section to record SRM condition (bypassed, jumpered, N/A).

A Technical Specification cross reference index is being developed to aid operators in finding applicable Technical Specifications. This index will be completed by March 1, 1987.

In conclusion, both causes of the Technical Specification violation, human error and procedure deficiency, have been addressed by the procedural additions to N2-OSP-RMC-W@002. No events of a similar nature have occurred as of November 30, 1986.

Identification of Components Referred to in this LER

<u>Component</u>	<u>IEEE 803 EIIIS Funct</u>	<u>IEEE 805 System ID</u>
Source Range Monitor (SRM)	JI	IG



THOMAS E. LEMPGES
VICE PRESIDENT—NUCLEAR GENERATION

NIAGARA MOHAWK POWER CORPORATION

NMP-22404

NIAGARA  MOHAWK

300 ERIE BOULEVARD WEST
SYRACUSE, N. Y. 13202

December 4, 1986

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

RE: Docket No. 50-410
LER 86-02

Gentlemen:

In accordance with 10 CFR 50.73, we hereby submit the following Licensee Event Report:

LER 86-02 Which is being submitted in accordance with 10 CFR 50.73 (a) (2) (i) (B), "Any operation or condition prohibited by the plant's Technical Specifications;"

This report was completed in the format designated in NUREG-1022 dated September 1983.

Very truly yours,

Thomas E. Lempges
Vice President
Nuclear Generation

TEL/mjd

Attachments

cc: Dr. T. E. Murley
Regional Administrator

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