

NRC FORM 366
(4-95)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 4/30/98

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)

COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1 & 2

Docket Number (2)

05000445

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Title (4)

ISSUES DISCOVERED DURING THE REVIEW OF GENERIC LETTER 96-01 ASSOCIATED WITH TECHNICAL
SPECIFICATION SURVEILLANCES

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 Numbers																			
0	3	1	0	9	8	9	7	-	0	0	4	-	0	5	0	4	0	9	9	8	N/A	0	5	0	0	0	4	4	6

Operating Mode (9) 1

Power Level (10) 100

This report is submitted pursuant to the requirements of 10 CFR 5. (Check one or more) (11)

☐ 20.2201 (b)	☐ 20.2203 (a) (2) (v)	☒ 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
☐ 20.2203 (a) (2) (iv)	☐ 50.36 (c) (2)	☐ 50.73 (a) (2) (vi)	☐ or in NRC Form 366A

Licensee Contact For This LER (12)

Name

David A. Goodwin - Operations Support Manager

Telephone Number (Include Area Code)

(254)897-0815

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
				N					

Supplemental Report Expected (14)

X	YES (If yes, completed EXPECTED SUBMISSION DATE)	NO	EXPECTED SUBMISSION DATE (15)	Month	Day	Year
				0	6	0
				9	9	8

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

EVENT 1

On June 24, 1997, at approximately 11:00 a.m., during a review of surveillance procedures involving testing of safety-related logic circuits, it was determined that plant surveillance procedures did not adequately test, on a quarterly basis, the Solid State Protection System (SSPS) P-11 input relays during Analog Channel Operational Tests (ACOTs). The cause of this condition is attributed to an incorrect previous interpretation of the Licensing Basis requirements related to testing for the SSPS P-11 input relays. Corrective actions taken include declaring the P-11 interlock inoperable, revising procedures to perform the quarterly surveillances, and performing all of the SSPS P-11 quarterly surveillances required by the Technical Specifications.

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ABSTRACT (continued):

EVENT 2

On October 9, 1997, during a review of Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits," it was determined that a slave relay test for the Service Water Pump (SWP) (EIIS:(P)(BI)) non-1E motor space heaters required per the plant's Technical Specification were not performed. Corrective actions are to revise the applicable plant procedures and perform the test during the upcoming scheduled surveillances.

EVENT 3

On November 18, 1997, during a review of Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits," it was determined that the logic for; a) source range block P-10; b) feedwater isolation from P-14, steam generator Hi-Hi level; and c) feedwater isolation on Safety Injection was not tested for all possible combinations of input. Corrective actions were to revise the applicable surveillance procedures to incorporate steps for testing the aforementioned circuits.

EVENT 4

On February 13, 1998, during a review of Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits," it was determined that the Train B Diesel Generator 24 hour load testing procedure did not include breaker XEB4-3, for CPSES Unit 2 Train B in the testing logic. Corrective actions are to revise the applicable procedure to include the breakers in the test logic.

EVENT 5

On February 13, 1998, during a review of Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits," it was determined that, even though the Safety Injection Sequencer contacts were tested, proper documentation with respect to delay times was not captured. Corrective actions are to revise the applicable test procedures to incorporate the documentation of the delay times for pump startups.

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ABSTRACT (continued):

EVENT 6

On March 3, 1998, during a review of Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits," it was determined that, the emergency diesel generator start signals on degraded voltages of the 6.9 kV and 480V power supplies may have not been adequately verified. Corrective actions were to revise the applicable test procedures to incorporate the relays that are required to be tested.

EVENT 7

On March 10, 1998, during a review of Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits," it was determined that portions of the testing required by current Technical Specification requirements 4.8.1.1.2f.4b and 6b have not been completely performed. Specifically, testing of the sequencer load group contacts to equipment is missing or cannot be distinguished from other possible circuit actuations. Corrective actions were to revise the applicable test procedures to incorporate sequencer load group contacts that are required to be tested.

EVENT 8

On March 12, 1998, during a review of Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits," it was determined that, Technical Specification requirements 4.8.1.1.2f.4a and 4.8.1.1.2f.6a have not been completely performed. Specifically, testing of the load shedding scheme for non-class 1E Motor Control Centers (MCCs) does not confirm that shedding is accomplished by undervoltage relays instead of diesel generator breaker closure. The corrective actions were to revise the applicable test procedures to include the testing of the load shedding scheme for non-class 1E MCCs by diesel generator breaker closure.

EVENT 9

On March 17, 1998, during a review of Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits," it was determined that portions of the testing required by current Technical Specification requirements 4.7.7.1I for the

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ABSTRACT (continued):

Control Room Emergency Filtration/Pressurization (CREF) system emergency recirculation function have not been completely performed. Specifically, testing of the trip function of fans from the opposite train actuation and opening of the outside air intake dampers is missing. Corrective actions included a revision to the applicable test procedures to address the trip function from the opposite train and subsequent performance of the required testing.

EVENT 10

On March 24, 1998, during a review of Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits," it was determined that, portions of the testing required by Surveillance Requirements 4.8.1.1.2f.4, 4.8.1.1.2f.6 and corresponding SRs in 4.8.1.2, have not previously been demonstrated as acceptable. These portions include (a) certain sequencer generated operator and automatic lockouts which ensure non-1E equipment separates from the A.C. busses, actuate equipment and preclude equipment from attempting to load inappropriately onto the vital A.C. busses; (b) unambiguous confirmation that diesel generator trips are bypassed on an emergency start due to multiple contacts in series; (c) verifications that motor control center (MCC) load seal-in contacts open upon bus deenergization thereby ensuring that equipment that was previously operating does not attempt to reload inappropriately onto the bus and (d) 480 V undervoltage relays load shed the emergency fill fire pump. Corrective actions included requesting and receiving enforcement discretion where necessary, and revisions to the applicable test procedures to perform the required tests where possible given the unit's plant conditions.

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I. DESCRIPTION OF THE REPORTABLE EVENTA. REPORTABLE EVENT CLASSIFICATION

Any operation or condition prohibited by the plant's Technical Specifications.

B. PLANT OPERATING CONDITIONS PRIOR TO THE EVENTSEVENT 1

On June 24, 1997 at approximately 11:00 a.m., Comanche Peak Steam Electric Station (CPSES) Units 1 and 2 were both in Mode 1, Power Operation, at approximately 100 percent power.

EVENT 2

On October 9, 1997, Comanche Peak Steam Electric Station (CPSES) Units 1 and 2 were both in Mode 1, Power Operation, at approximately 100 percent power.

EVENT 3

On November 18, 1997, Comanche Peak Steam Electric Station (CPSES) Units 1 was in Mode 1, Power Operation, at approximately 100 percent power. CPSES Unit 2 was in its third refueling outage.

EVENT 4

On February 13, 1998, Comanche Peak Steam Electric Station (CPSES) Units 1 and 2 were both in Mode 1, Power Operation, at approximately 100 percent power.

EVENT 5

On February 13, 1998, Comanche Peak Steam Electric Station (CPSES) Units 1 and 2 were both in Mode 1, Power Operation, at approximately 100 percent power.

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EVENT 6

On March 3, 1998, Comanche Peak Steam Electric Station (CPSES) Units 1 and 2 were both in Mode 1, Power Operation, at approximately 100 percent power.

EVENT 7

On March 10, 1998, Comanche Peak Steam Electric Station (CPSES) Units 1 and 2 were both in Mode 1, Power Operation, at approximately 100 percent power.

EVENT 8

On March 12, 1998, Comanche Peak Steam Electric Station (CPSES) Units 1 and 2 were both in Mode 1, Power Operation, at approximately 100 percent power.

EVENT 9

On March 17, 1998, Comanche Peak Steam Electric Station (CPSES) Units 1 and 2 were both in Mode 1, Power Operation, at approximately 100 percent power.

EVENT 10

On March 24, 1998, Comanche Peak Steam Electric Station (CPSES) Unit 2 was in Mode 1, Power Operation, at approximately 100 percent power, and Unit 1 was in a refueling outage in Mode 5, Cold Shutdown

C. STATUS OF STRUCTURES, SYSTEMS, OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

Not applicable - No structures, systems, or components were inoperable that contributed to the identified condition.

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D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES

EVENT 1

On June 24, 1997 at approximately 11:00 a.m., during a review of surveillance procedures involving testing of safety-related logic circuits conducted in accordance with NRC Generic Letter 96-01 and during review of Operating Experience reports which describe incomplete quarterly surveillance testing of Solid State Protection System (SSPS) (EIIS:(JG)) P-11 permissive logic, I&C personnel (utility, non-licensed) determined that plant surveillance procedures had not adequately tested, on a quarterly basis, the SSPS P-11 input relays (EIIS:(RLY)(JG)) during Analog Channel Operational Tests (ACOTs). The P-11 interlock (EIIS:(IEL)(JG)) (1960 psig pressurizer pressure setpoint) permits a normal unit cooldown and depressurization without actuation of Safety Injection (SI) or Main Steam (MS) line isolation by permitting a manual block of these signals. Above the P-11 setpoint, Pressurizer Pressure-Low SI and Steamline Pressure-Low SI are automatically enabled.

Bypass testing design modifications of the SSPS were implemented at CPSES during the fifth refueling outage for Unit 1 (November 25, 1996) and during the second refueling outage for Unit 2 (May 30, 1996). With the bypass testing configuration, it was initially determined that the SSPS design and surveillance tests adequately addressed the Technical Specification surveillance requirements for the SSPS P-11 input relays and that only ACOT performances prior to the design modifications were inadequate. However, on July 16, 1997, at approximately 3:30 p.m., it was discovered that current SSPS ACOTs did not adequately address Technical Specification surveillance requirements. Specifically, it was discovered that the Trip Status Light Box windows for P-11 were not being verified in the OFF condition, which is the positive indication of the SSPS input relay functioning. Immediate corrective actions taken included declaring the Engineered Safety Features Actuation System (ESFAS) interlock P-11 on both Units 1 and 2 inoperable on July 16, 1997 at approximately 3:30 p.m.. Interlock P-11 operability was restored for both Units 1 and 2 on July 18, 1997, at approximately 6:00 p.m. by performing the revised ACOT procedures.

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The I&C test procedures for the ACOT did not adequately verify overlap from the 7300 channel test card through the SSPS P-11 input relays. This was due to these loops being de-energized at power (above the P-11 setpoint). In this configuration, tripping and/or restoring the instrument loop produced no change of state of the input relay and thus no indication of change on the trip status panel (EIIS:(PL)). Without a change in this indication, positive indication of the input relay operation could not be verified. Revised procedures associated with the bypass testing design modification did exercise the input relay, but did not contain a positive verification of the relay operation.

The ACOT surveillance procedures included verification that the P-11 interlocks were in the required state for the existing plant condition which is equivalent to Technical Specification 3.3.2, Table 3.3-2, Item 10.a, Action 18. In addition, plant procedures also verified that P-11 properly transitioned to the correct state during plant shutdowns and plant startups.

EVENT 2

Comanche Peak Steam Electric (CPSES) Technical Specification section 4.3.2.1.1.b requires that Engineered Safety Features Actuation System (ESFAS) for Safety Injection instrumentation channel, interlock, the automatic actuation logic, and relays shall be demonstrated OPERABLE by performance of the ESFAS instrumentation surveillance requirements specified in part to be a Slave Relay Test. On October 9, 1997 during a review (as specified via the GL 96-01), a plant operations person (Utility, Non-Licensed) identified that the CPSES Unit 1 and Unit 2 Slave Relay (EIIS:(RLY)(BI)) actuation test procedures did not include testing of associated contacts which open to isolate Service Water Pump non-1E motor space heaters from the supply 1E buses.

EVENT 3

On November 18, 1997, during a review (as specified via the GL 96-01), plant personnel (Utility, Non-Licensed) identified that a potential existed that SSPS testing may be less than adequate. After analysis and discussions with the vendor (Westinghouse) and other utilities with similar systems, it was determined that the

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current Solid State Protection System (SSPS)(EIIS:(JG)) surveillance testing did not adequately test certain logic circuits. The circuits involved use Universal Logic Boards in a memory configuration. There are three functions which were inadequately tested: Source Range (EIIS:(IG)) Automatic P-10 Block, Feedwater Isolation on P-14 steam generator (EIIS:(SG)(AB)) Hi-Hi Level, and Feedwater (EIIS:(BA)) Isolation on a Safety Injection (EIIS:(BQ)).

EVENT 4

Comanche Peak Steam Electric Station (CPSES) Technical Specification sections 4.8.1.1.2.f.4a and 6a require verification of deenergization of the diesel generator busses and load shedding of the emergency busses. These verifications are required to be performed at least once per 18 months, during a shutdown by simulating a loss-of-offsite power and loss-of-offsite power in conjunction with a safety injection actuation signal. On February 13, 1998, during a review of the applicable procedures pursuant to the guidance provided via Generic Letter (GL) 96-01, plant personnel (utility, licensed) assigned to GL 96-01 review discovered that the Motor Control Center breakers XEB4-3 for CPSES Unit 2 Train B; which receives an undervoltage shunt trip signal during a loss-of-offsite power and loss-of-offsite power in conjunction with a safety injection signal was not included in the current surveillance procedures.

EVENT 5

Comanche Peak Steam Electric Station (CPSES) Technical Specification section 4.8.1.1.2.f.6b requires verification of energization of the emergency busses for diesel starts on the auto-start signal within certain time limits. These verifications are required to be performed at least once per 18 months, during a shutdown by simulating a loss-of-offsite power in conjunction with a safety injection actuation signal. On February 13, 1998, during a review of the applicable procedures pursuant to the guidance provided via Generic Letter (GL) 96-01, plant personnel (utility, licensed) assigned to GL 96-01 review discovered that even though the surveillance was performed, as required, the applicable time delays were not documented.

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EVENT 6

Comanche Peak Steam Electric Station (CPSES) Technical Specification Table 4.3-2 "Engineered Safety Features Actuation System Instrumentation Surveillance Requirements," line items 8.d, 8.e and 8.f require verification of the circuits including contacts 62-2 in the trip coil circuits for the preferred and alternate offsite breakers. On March 3, 1998, during a review of the applicable procedures pursuant to the guidance provided via Generic Letter (GL) 96-01, plant personnel (utility, licensed) assigned to GL 96-01 review discovered that the required verifications for the contacts in the closed position were not performed.

EVENT 7

Comanche Peak Steam Electric Station (CPSES) Technical Specification sections 4.8.1.1.2.f.4b and 6b require verification of diesel starting on the auto-start signal and energization of auto-connected loads through the load sequencer. These verifications are required to be performed at least once per 18 months during shutdown by simulating a loss-of-offsite power by itself and in conjunction with a safety injection actuation signal. On March 10, 1998, during a review of Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits," it was determined that portions of the testing required by current Technical Specification requirements 4.8.1.1.2.f.4b and 6b had not been completely performed. Specifically, testing of some sequencer load group contacts to equipment is missing or cannot be distinguished from other possible circuit actuations.

EVENT 8

Comanche Peak Steam Electric Station (CPSES) Technical Specification sections 4.8.1.1.2.f.4a and 6a require verification of deenergization of the diesel generator busses and load shedding of the emergency busses. These verifications are required to be performed at least once per 18 months, during shutdown by simulating a loss-of-offsite power and loss-of-offsite power in conjunction with a safety injection actuation signal. On March 12, 1998, during a review of Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits," it was determined that Technical

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Specification requirements 4.8.1.1.2f.4a and 4.8.1.1.2f.6a had not been completely performed. Specifically, testing of the load shedding scheme for non-class 1E Motor Control Centers (MCCs) did not specifically confirm that shedding is accomplished by undervoltage relay contacts.

EVENT 9

Comanche Peak Steam Electric Station (CPSES) Technical Specification section 4.7.7.1I requires verification that each Control Room Emergency Filtration / Pressurization (CREF) system train actuates on an actual or simulated Safety Injection, Loss of Offsite Power, or Intake Vent-high Radiation Signal. On March 17, 1998, during a review of Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits," it was determined that portions of the testing required by current Technical Specification requirements 4.7.7.1I for the CREF system have not been completely performed. Specifically, testing of the trip function of fans from the opposite train actuation and opening of the outside air intakes were missing in that the tests for the CREF actuation confirmed the shift to recirculation mode, but the fan trips and damper openings were only verified from the associated train.

EVENT 10

Comanche Peak Steam Electric Station (CPSES) Technical Specification sections 4.8.1.1.2 requires each Emergency Diesel Generator be demonstrated OPERABLE by the surveillance tests of that section. On March 24, 1998, at approximately 2:30 PM CST during a review of Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits," it was determined that portions of the testing required by Surveillance Requirements 4.8.1.1.2f.4, 4.8.1.1.2f.6 and corresponding Surveillance Requirements in 4.8.1.2, have not previously been demonstrated as acceptable. These portions include (a) certain sequencer generated operator and automatic lockouts which ensure non-1E equipment separates from the A.C. busses, actuate equipment and preclude equipment from attempting to load inappropriately onto the vital A.C. busses; (b) unambiguous confirmation that diesel generator trips are bypassed on an emergency start due to multiple contacts in series; (c) verifications that motor control center (MCC) load seal-in contacts

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open upon bus deenergization thereby ensuring that equipment that was previously operating does not attempt to reload inappropriately onto the bus and (d) 480 V undervoltage relays load shed the emergency fill fire pump.

E. THE METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE OR PROCEDURAL ERROR

EVENT 1

Engineered Safety Features Actuation System (ESFAS) interlock P-11 for both Units 1 and 2 was declared inoperable from July 16, 1997 at approximately 3:30 p.m. to July 18, 1997 at approximately 6:00 p.m.. Because the quarterly surveillance testing of SSPS P-11 permissive logic has never been adequately performed, the P-11 interlock for both Units has been technically inoperable since initial entry into Mode 3 on Units 1 and 2. However, TU Electric believes that the P-11 interlock would have performed its intended safety function during the period of inoperability as discussed in paragraph II.C below.

EVENT 2

Operations support personnel discovered that slave relay testing was not performed, and was not included in the plant procedures, during the review and actions specified via GL 96-01.

EVENT 3

Plant personnel discovered that the current SSPS testing was not performed for certain logic circuitry, and was not included in the plant procedures, during the review and actions specified via GL 96-01.

EVENT 4

Plant personnel assigned to the review of GL 96-01 discovered that certain breakers were not included in the surveillance procedures.

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EVENT 5

Plant personnel assigned to the review of GL 96-01 discovered that even though the surveillance was performed, as required, the applicable time delays were not documented.

EVENT 6

Plant personnel assigned to the review of GL 96-01 discovered that the required verifications for the contacts in the closed position were not performed.

EVENT 7

Plant personnel assigned to the review of GL 96-01 discovered that the portions of the testing required by current Technical Specification requirements 4.8.1.1.2.f.4b and 6b have not been included in the applicable procedures.

EVENT 8

Plant personnel assigned to the review of GL 96-01 discovered that the Technical Specification requirements 4.8.1.1.2f.4a and 4.8.1.1.2f.6a have not been completely performed.

EVENT 9

Plant personnel assigned to the review of GL 96-01 discovered that portions of the testing required by current Technical Specification requirements 4.7.7.1I for the Control Room Emergency Filtration/Pressurization (CREF) system have not been completely performed.

EVENT 10

Plant personnel assigned to the review of GL 96-01 discovered that portions of the testing required by Surveillance Requirements 4.8.1.1.2f.4, 4.8.1.1.2f.6 and corresponding SRs in 4.8.1.2, have not previously been demonstrated as acceptable.

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II. ANALYSIS OF THE EVENT

A. SAFETY SYSTEM RESPONSES THAT OCCURRED

Not Applicable - No safety systems responded.

B. DURATION OF SAFETY SYSTEM TRAIN INOPERABILITY

EVENT 1

Engineered Safety Features Actuation System (ESFAS) interlock P-11 for both Units 1 and 2 was declared inoperable from July 16, 1997 at approximately 3:30 p.m. to July 18, 1997 at approximately 6:00 p.m.. Because the quarterly surveillance testing of SSPS P-11 permissive logic has never been adequately performed, the P-11 interlock for both Units has been technically inoperable since initial entry into Mode 3 on Units 1 and 2. However, TU Electric believes that the P-11 interlock would have performed its intended safety function during the period of inoperability as discussed in paragraph II.C below.

EVENT 2

Not Applicable- No safety system or train was deemed inoperable.

EVENT 3

Not Applicable- No safety system or train was deemed inoperable. However, affected systems were considered to be administratively inoperable under the auspices of Technical Specification 4.0.3. The required surveillances were performed and the systems were declared operable within the allowed outage time.

EVENT 4

Not Applicable- No safety system or train was deemed inoperable. TU Electric confirmed that failure to load shed these busses would not result in the diesel generators being inoperable as both diesels have sufficient reserve capacity to emergency start and perform their safety functions with these busses loaded at time zero in the diesel generator loading sequence. TU Electric

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believes that this specification only requires testing of the loads which are required to be load shed to allow the DG to perform its specified safety functions. Because the diesel generators remain capable of performing their specified safety functions without the load shed of this bus, TU Electric concluded that the surveillance had been met.

EVENT 5

Not Applicable- No safety system or train was deemed inoperable.

EVENT 6

Not Applicable- No safety system or train was deemed inoperable. However, affected systems were considered to be administratively inoperable under the auspices of Technical Specification 4.0.3. The required surveillances were performed and the systems were declared operable within the allowed outage time.

EVENT 7

Not Applicable- No safety system or train was deemed inoperable. However, affected systems were considered to be administratively inoperable under the auspices of Technical Specification 4.0.3. The required surveillances were performed and the systems were declared operable within the allowed outage time.

EVENT 8

Not Applicable- No safety system or train was deemed inoperable. However, affected systems were considered to be administratively inoperable under the auspices of Technical Specification 4.0.3. The required surveillances were performed and the systems were declared operable within the allowed outage time.

EVENT 9

Not Applicable- No safety system or train was deemed inoperable. However, affected systems were considered to be administratively inoperable under the auspices of Technical Specification 4.0.3. The required surveillances were performed and the systems were

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declared operable within the allowed outage time.

EVENT 10

Not Applicable- No safety system or train was deemed inoperable. However, affected systems were considered to be administratively inoperable under the auspices of Technical Specification 4.0.3. CPSES Units 1 and 2 were granted enforcement discretion initially as requested in TU Electric letter TXX 98091 dated March 24, 1998, and TXX 98095 dated March 26, 1998. Unit 2 has subsequently been granted an enforcement discretion as requested in TU Electric letter TXX 98-98116 dated April 7, 1998 to allow CPSES Unit 2 to continue to operate while a temporary Technical Specification change is processed. This change would allow the unit to continue to operate until a shutdown outage to perform the surveillance testing required.

C. SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT

EVENT 1

The identified condition is similar to those examples presented in Generic Letter 96-01 where surveillance testing of the logic circuit was incomplete. In this case, a small portion of the circuit was omitted. The ACOT surveillance procedures in effect during this time period did include verification that the P-11 interlocks were in the required state for the existing plant condition which is equivalent to Technical Specification 3.3.2 Table 3.3-2, Item 10.a, Action 18. In addition, plant procedures also verified that P-11 properly transitioned to the correct state during plant shutdowns and plant startups. Therefore, based on the above considerations, this event did not adversely affect the safety of plant operations or the health and safety of the public.

EVENT 2

A Service Water Pump motor space heater is only energized through a contact that is closed when the motor supply breaker is open. The only concern for isolation of the non-qualified motor space heater is when the Service Water Pump motor's supply breaker is open. However, in this condition, if a safety injection signal would

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occur, and the untested isolation device failed to open, and a fault occurred in the non-qualified motor space heater. The fault would still be prevented from propagating to the 1E power supply bus by a Class 1E circuit breaker which would trip open per the standard breaker coordination. Therefore, based on the aforementioned considerations, this event did not adversely affect the safety of plant operations or the health and safety of the public.

EVENT 3

The inadequacy associated with this testing scheme is that when the set pushbutton is depressed, there are logic low signals provided at three of the card inputs. The actuation logic is based on "low" inputs at two of the three card inputs. Since the logic tested was equivalent to 3/3, the bimonthly surveillance did not adequately test the 2/3 logic. An internal card failure could be postulated (i.e., diode CR10 fails open) which would not be detected by the testing scheme. Assuming the presence of this undetectable failure plus the failure of another channel, an actual P-14 signal would not have actuated the Feedwater Isolation unless a P-4 Reactor Trip signal was also present. A similar scenario also exists for the other two memory functions listed above.

However, the Safety Injection Feedwater Isolation circuitry and the P-14 Feedwater Isolation circuitry are tested each refueling outage during the Time Response test. Proper operation of the cards is confirmed by simulating actual signals and timing the response through the circuits. Based on the successful tests performed during the previous outages and upon discovery of the condition, such a failure was confirmed to not exist. Therefore, based on the aforementioned considerations, this event did not adversely affect the safety of plant operations or the health and safety of the public.

EVENT 4

The safety function of the A.C. Sources is to ensure that sufficient power will be available to supply the safety related equipment required for: (1) the safe shutdown of the facility, and (2) the mitigation and control of accident conditions within the

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facility. The function of the Surveillance Requirement of concern is to demonstrate that for a start of the diesel generators, the emergency busses will de-energize and sufficient load will be shed, to allow the diesel generator to start, connect to the emergency busses and load. Because the busses in question can be loaded on the diesel generator at time zero of the loading sequence without affecting the ability of the diesel generator to properly start, connect to the emergency bus and load, thereby performing its safety function, failure to test the load shed feature with respect to this single load has no impact on safety. Therefore, based on the aforementioned considerations, this event did not adversely affect the safety of plant operations or the health and safety of the public.

EVENT 5

The delay times were available through the plant computer. The required surveillances were being performed and the equipment was not deemed degraded or inoperable; no consequences of continued operation in the current condition are evident. Therefore, based on the aforementioned considerations, this event did not adversely affect the safety of plant operations or the health and safety of the public.

EVENT 6

The subject event identifies that the contact 62-2 in the trip coil circuits for the second level undervoltage scheme was not tested using the procedure used to test undervoltage relay during cold shutdown. The contact in question (62-2) in the circuit is required to be closed for tripping of the offsite feeders on a 6.9 KV degraded, the 480V degraded, and the 480V low grid voltage trip functions. When the contacts were explicitly included in a surveillance, they were found to be in the correct position. Therefore, this event did not adversely affect the safety of plant operations or the health and safety of the public.

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EVENT 7

The safety function of the A.C. Sources is to ensure that sufficient power will be available to supply the safety related equipment required for: (1) the safe shutdown of the facility, and (2) the mitigation and control of accident conditions within the facility. The diesel generator has repeatedly demonstrated the capability to start and load satisfactorily. Although testing of some sequencer load group contacts to equipment was missing or could not be distinguished from other possible circuit actuations, these previous tests added additional evidence that confirmation of OPERABILITY is probable. Subsequently, the required tests were performed satisfactorily consistent with the Technical Specification requirements. Therefore, this event did not adversely affect the safety of plant operations or the health and safety of the public.

EVENT 8

The safety function of the A.C. Sources is to ensure that sufficient power will be available to supply the safety related equipment required for: (1) the safe shutdown of the facility, and (2) the mitigation and control of accident conditions within the facility. The diesel generator has repeatedly demonstrated the capability to start and load satisfactorily. Although testing of the load shedding scheme for non-class 1E Motor Control Centers (MCCs) did not confirm that shedding is accomplished by undervoltage relays instead of diesel generator breaker closure, these previous tests added additional evidence that confirmation of OPERABILITY is probable. Subsequently, the required tests were performed satisfactorily consistent with the Technical Specification requirements. Therefore, this event did not adversely affect the safety of plant operations or the health and safety of the public.

EVENT 9

Although it was determined that portions of the testing required by current Technical Specification requirements 4.7.7.1I for the Control Room Emergency Filtration/Pressurization (CREF) system has not been completely performed in that testing of the trip function

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of fans and open actuation of the outside air intake dampers from the opposite train actuation is missing. Subsequently, the required tests were performed satisfactorily consistent with the Technical Specification requirements. Therefore, this event did not adversely affect the safety of plant operations or the health and safety of the public.

EVENT 10

The safety function of the A.C. Sources is to ensure that sufficient power will be available to supply the safety related equipment required for: (1) the safe shutdown of the facility, and (2) the mitigation and control of accident conditions within the facility. The diesel generator has repeatedly demonstrated the capability to start and load satisfactorily. Although it was determined that, portions of the testing required by Surveillance Requirements 4.8.1.1.2f.4, 4.8.1.1.2f.6 and corresponding Surveillance Requirements in 4.8.1.2, have not previously been appropriately demonstrated, these previous tests added additional evidence that confirmation of OPERABILITY is probable. The required surveillances are being performed where possible for each unit given its specific plant condition, and the systems are being declared operable as allowable. CPSES Units 1 and 2 were granted enforcement discretion initially as requested in TU Electric letter TXX 98091 dated March 24, 1998, and TXX 98095 dated March 26, 1998. Unit 2 has subsequently been granted an enforcement discretion as requested in TU Electric letter TXX 98-98116 dated April 7, 1998 to allow CPSES Unit 2 to continue to operate while a temporary technical specification change is processed. The Safety Significance of this event is discussed in more detail in TU Electric letters TXX 98091, TXX 98095, and TXX 98116. Therefore, this event did not adversely affect the safety of plant operations or the health and safety of the public.

III. CAUSE OF THE EVENT

EVENT 1

The cause of this condition is attributed to an incorrect previous interpretation of the Licensing Basis requirements related to testing for

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the SSPS P-11 input relays. The design of these relays, at the time the initial surveillance procedures were developed, did not allow for testing of the relays while the plant was in power operation. Based on this design configuration, and the interpretation at that time of the FSAR testing description, it was not recognized that the strict definition of the Technical Specification ACOT requirement included operation and verification of the SSPS input relays.

EVENT 2

TU Electric believes that since qualified isolation devices were installed pursuant to the requirements of Regulatory Guide 1.75. It was believed by the procedure writers and the technical reviewers that an ESFAS instrumentation surveillance was not required for these particular devices.

EVENT 3

The Safety Injection Feedwater Isolation circuitry and the P-14 Feedwater Isolation circuitry are tested each refueling outage during the Time Response test. Proper operation of the cards is confirmed by simulating actual signals and timing the response through the circuits. However, the surveillance frequency of bimonthly testing for the SSPS was not being satisfied for these three functions.

The original testing design for these three circuits was less than adequate and did not fully verify proper operation of the SSPS logic cards.

EVENT 4

A review of previous revisions of the procedures for the surveillance of loss-of-offsite power was performed. It was noted that a revision of the now retired procedure, did include verification of the breaker XEB4-3. It was believed that the procedure was cumbersome as written, and was made to branch the procedure into several other procedures to capture the requirements of the Technical Specifications. However, in doing so the requirement for verification of the breaker and the corresponding breakers on Unit 1, and Unit 2 Train A were inadvertently removed. During some period in 1995, when a review of the blackout sequencer was being performed, it was noted that these verifications were not included and

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Unit 1 procedures were revised to incorporate the verification steps. In 1996 Unit 2 Train A procedures were revised to incorporate the breaker verification steps, however, the step to verify the breaker for CPSES Unit 2 Train B procedures were again overlooked. TU Electric believes that the cause of the event was an incomplete revision to the current procedures.

EVENT 5

TU Electric believes that the existing procedures were written to verify overall system function. Based on the guidance and insight provided via GL 96-01, it was determined that the procedures should have been written such that all portions of the logic circuitry including the parallel logic, interlocks, bypasses and inhibit circuits are confirmed. Consequently, this led to omission of the requirement to document the delay time in the applicable procedure. The starting time delay anomaly affected the documentation of eight pumps (per train) for Component Cooling Water, Containment Spray (2 pumps), Motor driven Auxiliary Feedwater, Station Service Water, Safety Injection, Residual Heat Removal and Centrifugal Charging System.

EVENT 6

It was determined that the procedures were written such that not all portions of the logic circuitry including the parallel logic, interlocks, bypasses and inhibit circuits are confirmed. This led to omission of the requirement to verify the contact 62-2 in closed position in the applicable procedure. When all parts of the overlapping testing were checked against circuit drawings, it was noted that the 62-2 contact was missing. However, the operability of the relay was verified (which contains this contact) via a different set of procedures. Therefore, the operability of the contact in closed position is not in question.

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EVENT 7

TU Electric believes that the existing procedures were written to verify overall system function. Based on the guidance and insight provided via GL 96-01, it was determined that the procedures should have been written such that all portions of the logic circuitry including the parallel logic, interlocks, bypasses and inhibit circuits are confirmed. Consequently, this led to the testing of the sequencer load group contacts to equipment being missing or cannot be distinguished from other possible circuit actuations.

EVENT 8

TU Electric believes that the existing procedures were written to verify overall system function. Based on the guidance and insight provided via GL 96-01, it was determined that the procedures should have been written such that all portions of the logic circuitry including the parallel logic, interlocks, bypasses and inhibit circuits are confirmed. Consequently, this led to testing of the load shedding scheme for non-class 1E Motor Control Centers (MCCs) not confirming that shedding is accomplished by undervoltage relays instead of diesel generator breaker closure.

EVENT 9

TU Electric believes that the existing procedures were written to verify overall system function. Based on the guidance and insight provided via GL 96-01, it was determined that the procedures should have been written such that all portions of the logic circuitry including the parallel logic, interlocks, bypasses and inhibit circuits are confirmed. Consequently, this led to omission of portions of the testing required by current Technical Specification requirements 4.7.7.11 for the Control Room Emergency Filtration / Pressurization (CREF) system not being completely performed, in that testing of the trip function of fans from the opposite train actuation and open actuation of the outside air intake dampers was missing.

EVENT 10

TU Electric believes that the existing procedures were written to verify overall system function. Based on the guidance and insight provided via

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GL 96-01, it was determined that the procedures should have been written such that all portions of the logic circuitry including the parallel logic, interlocks, bypasses and inhibit circuits are confirmed. Consequently, this led to portions of the testing required by Surveillance Requirements 4.8.1.1.2f.4, 4.8.1.1.2f.6 and corresponding SRs in 4.8.1.2, having not been previously demonstrated as acceptable.

IV. CORRECTIVE ACTIONS

EVENT 1

Upon discovering that the Trip Status Light Box windows for P-11 were not being verified in the OFF condition, the Engineered Safety Features Actuation System (ESFAS) interlock P-11 for both Units 1 and 2 was declared inoperable on July 16, 1997 at 3:30 p.m. Interlock P-11 operability was restored for both Units 1 and 2 on July 18, 1997 at approximately 6:00 p.m.. Procedure revisions to perform the quarterly surveillances have been issued and all of the required Technical Specification quarterly surveillances have been performed. Reviews of surveillance procedures which involve testing of safety-related logic circuits are continuing in accordance with NRC Generic Letter 96-01. These reviews provide additional assurance that any similar conditions will be identified.

EVENT 2

Operations has placed the supply breakers to the Service Water Pump motor space heater in the open position until satisfactory surveillance testing of the contacts is completed. The surveillance testing will be performed during the upcoming scheduled surveillances. Applicable procedures are being revised to incorporate the required surveillance requirements.

EVENT 3

The surveillance procedures at both CPSES Unit 1 and 2 were revised and both SSPS trains for both were tested, and the test results were acceptable.

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EVENT 4

Upon discovery of the event an enforcement discretion was obtained (refer to TU Electric letter logged TXX-98049 dated February 20, 1998). Additionally, applicable procedures are being revised to incorporate the Technical Specification requirements with respect to verification of the breaker.

EVENT 5

Documentation for the previous tests were supplemented with a take credit package. Applicable procedures are being revised to incorporate the Technical Specification requirements with respect to recording of the time delays.

EVENT 6

An enforcement discretion was requested by TU Electric on March 3, 1998 (reference TU Electric letter to NRC logged TXX-98062 dated March 3, 1998). The enforcement discretion was subsequently determined not to be necessary. Testing was performed verify that the contact 62-2 was in closed position, the test results were satisfactory. Applicable procedures have been revised to incorporate the Technical Specification requirements with respect to verification of the contact in closed position.

EVENT 7

An enforcement discretion was requested for CPSES Unit 1 and 2. For more details please refer to TU Electric letters to NRC logged TXX-98071 dated March 10. Temporary test procedures were prepared to incorporate the missing testing. The testing was conducted satisfactorily within the Technical Specification allowance of TS 4.0.3. The enforcement discretion was for sufficient duration to process a Licence Amendment which will allow the at power tests to be credited to the surveillance requirement. The License Amendment Request (LAR) was submitted on March 12, 1998 by letter TXX 98076. Technical Specification requirements with respect to sequencer load group contacts for CPSES Unit 1 that are required to be tested, will be completed prior to the end of the current [ongoing] refueling outage, which will bring the unit in compliance with the TS requirements. Enforcement discretion for CPSES Unit 2 has been submitted

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via the aforementioned letters. The testing has been completed satisfactorily, and will be formally credited when the License Amendment Request is approved.

EVENT 8

Enforcement discretions were requested for CPSES Unit 1 and 2 by letters TXX-98077 dated March 12, and TXX-98078 dated March 13, 1998. The enforcement discretions were for sufficient duration to process a LAR which will allow crediting testing conducted at power to meet the surveillance requirements. The LAR was submitted by letter TXX-98079 dated March 18, 1998. Temporary procedures were prepared to incorporate the missing contact verifications. The testing was conducted satisfactorily within the allowance of TS 4.0.3.

EVENT 9

Corrective actions included a revision to the applicable test procedures to ensure that those portions of the testing required by Technical Specification requirements 4.7.7.1I for the Control Room Emergency Filtration / Pressurization (CREF) system address the trip function from the opposite train. The testing was conducted satisfactorily within the allowance of TS 4.0.3

EVENT 10

Corrective actions included requesting and receiving enforcement discretion where necessary, and revisions to the applicable test procedures to perform the required tests where possible given the unit's specific plant conditions. CPSES Units 1 and 2 were granted enforcement discretion initially as requested in TU Electric letter TXX-98091 dated March 24, 1998, and TXX 98095 dated March 26, 1998. Unit 2 has subsequently been granted an enforcement discretion as requested in TU Electric letter TXX 98-98116 dated April 7, 1998 to allow CPSES Unit 2 to continue to operate while a temporary technical specification change is processed. This change would allow the unit to continue to operate until the next Mode 3 outage to perform the surveillance testing required, and allows crediting of certain at power tests. This current enforcement discretion request and the associated license amendment request will complete the currently identified corrective actions for CPSES with the

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exception of the testing which will be performed at power and the testing deferred until a shutdown outage.

V. PREVIOUS SIMILAR EVENTS

There have been other missed surveillance events during the previous two years. However, TU Electric will review the identified surveillance anomalies upon completion of the GL 96-01 required actions to determine root cause of the event and determine additional actions if warranted. Nonetheless, TU Electric believes that the corrective actions for the previous events have been generally effective and are not related to this event.

VI. ADDITIONAL INFORMATION

TU Electric is nearing completion of the reviews required to comply with the actions identified in Generic Letter 96-01. An additional supplement to this LER will be forthcoming upon completion of the Generic Letter 96-01 reviews after the complete results are evaluated. The forthcoming supplement will finalize the root causes and corrective actions for these events and provide any other information that may be considered appropriate.