

September 13, 1999

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop P1-137
Washington, DC 20555-0001

ULNRC-4110

Gentlemen:



**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
LICENSEE EVENT REPORT 99-006-00
MANUAL ACTUATION OF
ENGINEERED SAFETY FEATURE COMPONENTS
DUE TO PERSONNEL ERROR**

The enclosed licensee event report is submitted in accordance with 10CFR50.73(a)(2)(ii) to report manual actuation of Engineered Safety Feature (ESF) components. Manual ESF actuation resulted following placement of a workman protection tag generated with an error.

A handwritten signature in cursive script, appearing to read "R. Anfalter".

R.D. Anfalter
Manager, Callaway Plant

RDA/mib

Enclosure

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Callaway Plant Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 8 3	PAGE (3) 1 OF 3
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TITLE (4)

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV. NO.	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)
0 8	1 3	9 9	9 9	- 0 0 6	- 0 0	0 9	1 3	9 9			0 5 0 0 0

OPERATING MODE (9) 3	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR (Check one or more of the following) (11)									
POWER LEVEL (10) 0	<input type="checkbox"/> 20 2201(b)	<input type="checkbox"/> 20 2203(a)(2)(v)	<input type="checkbox"/> 50 73(a)(2)(i)	<input type="checkbox"/> 50 73(a)(2)(vii)						
	<input type="checkbox"/> 20 2203(a)(1)	<input type="checkbox"/> 20 2203(a)(3)(i)	<input type="checkbox"/> 50 73(a)(2)(ii)	<input type="checkbox"/> 50 73(a)(2)(x)						
	<input type="checkbox"/> 20 2203(a)(2)(i)	<input type="checkbox"/> 20 2203(a)(3)(ii)	<input type="checkbox"/> 50 73(a)(2)(iii)	<input type="checkbox"/> 73 71						
	<input type="checkbox"/> 20 2203(a)(2)(ii)	<input checked="" type="checkbox"/> 20 2203(a)(4)	<input checked="" type="checkbox"/> 50 73(a)(2)(iv)	<input type="checkbox"/> OTHER (Specify in Abstract below or in Text, NRC Form 365A)						
	<input type="checkbox"/> 20 2203(a)(2)(iii)	<input type="checkbox"/> 50 36(c)(1)	<input type="checkbox"/> 50 73(a)(2)(v)							
<input type="checkbox"/> 20 2203(a)(2)(iv)	<input type="checkbox"/> 50 36(c)(2)	<input type="checkbox"/> 50 73(a)(2)(vi)								

NAME J. D. Schnack, Supervising Engineer, QA Regulatory Support		TELEPHONE NUMBER AREA CODE: 5 7 3 6 7 6 - 4 3 1 9	
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)									
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)			EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO							

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

10CFR50.72(b)(2)(ii) and 10CFR50.73(a)(2)(iv) require the reporting of any event or condition that results in a manual or automatic actuation of any Engineered Safety Feature (ESF), including the Reactor Protection System (RPS) except when: (A) The actuation results from and is part of the preplanned sequence during testing or reactor operation or, (B) The actuation is invalid.

On 8/13/99, with the plant in operating mode 3, hot standby, Utility Licensed Reactor Operators (URO) observed an automatic trip of the startup feedwater pump. The startup feedwater pump was being used to maintain steam generator level. The startup feedwater pump trip resulted from the inadvertent closure of the pump suction valve. URO's responded to the loss of feedwater by starting both motor driven auxiliary feedwater pumps. The motor driven auxiliary feedwater pumps are ESF components.

A workman protection assurance (WPA) program tag created in error resulted in the inadvertent closure of the startup feedwater pump suction valve. URO's assigned to WPA generation did not recognize the error at the time the tag was generated or at the time of issue to the field. This event has been discussed with personnel involved. This event will be addressed during Operations department training. The plant procedure describing reporting requirements will be revised.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

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		YEAR	SEQUENTIAL NUMBER	REV NO			
Callaway Plant Unit 1	0 5 0 0 0 4 8 3	9 9	- 0 0 6	- 0 0	0 2	OF	0 3

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

DESCRIPTION OF EVENT:

At 1719 hrs CDT on 8/13/99, pump PAE02⁽¹⁾, Startup Main Feedwater Pump tripped. PAE02 is a motor driven pump. The plant was in mode three, normal operating pressure and temperature. PAE02 was providing feedwater to all four steam generators. The pump tripped indirectly as a result of loss of pump suction due to inadvertent closure of ADV0405⁽²⁾, Condensate Reject to Steam Generator (S/G) Blow-down (B/D) Regenerative Heat Exchanger (HX) Isolation Valve.

Utility Reactor Operators (URO) responded appropriately by referring to procedure OTO-AE-00001, Feedwater System Malfunction. At 1724 hrs CT on 8/13/99, the UROs started the Motor Driven Auxiliary Feedwater Pumps⁽³⁾ to maintain S/G level, in accordance with OTO-AE-00001.

Immediately prior to PAE02 pump trip, a Utility Equipment Operator (UEO) was hanging tags for a Workman's Protection Assurance (WPA) tagout. During WPA tag generation, the WPA URO inadvertently generated a tag for the closure of valve ADV0405. The tag should have been created for valve AFV0405⁽⁴⁾, Feedwater High Pressure Heater 6A Shell Side to Condensate Vent Valve. The tag was generated and reviewed by a second WPA URO prior to issue to the plant for hanging. The UEO hanging the tag in the plant did not note the tag was for the incorrect component while hanging the tag.

BASIS FOR REPORTABILITY:

This condition requires a four-hour NRC notification under 10CFR50.72(b)(2)(ii) due to an unplanned event or condition resulting in a manual actuation of any Engineered Safety Feature (ESF).

This condition is reportable as a Licensee Event Report under 10CFR50.73(a)(2)(iv) due to an unplanned event or condition resulting in a manual actuation of any ESF.

CONDITION AT TIME OF EVENT:

MODE 3, Hot Standby
 Reactor Coolant System pressure – 2235 psig.
 Reactor Coolant System temperature – 557 degrees F.

ROOT CAUSE:

When the tagout was generated, the URO generating the tag inadvertently entered the incorrect second letter of the component system designator for the tag. The existence of components with similar identification numbers allowed generation of the tag without generation of an error message in the WPA System. While reviewing the WPA tagout, the second WPA URO ensured the number of the valve was correct. The second URO did not closely check the system designator characters on the tag.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

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					0 3	OF	0 3

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

Utility SROs did not recognize the need to perform the four-hour notification due to an unplanned manual start of an ESF component routinely used for plant startup and shutdown. Procedure APA-ZZ-00520, Reporting Requirements and Responsibilities, did not provide specific guidance for this type of situation.

CORRECTIVE ACTIONS:

The need for ensuring components are listed correctly on WPA tagouts has been discussed with the UROs involved. This event will be addressed during Operations Department retraining.

Procedure APA-ZZ-00520 will be revised to enhance reportability guidance in the event of a manual ESF component operation. Immediate reportability requirements will be reviewed with Operations Department SROs during retraining.

SAFETY SIGNIFICANCE:

The UROs started both Motor Driven Auxiliary Feedwater Pumps in accordance with OTO-AE-00001. Both Auxiliary Feedwater Pumps started in accordance with design. In the plant configuration at the time, the Turbine Driven Auxiliary Feedwater pump could have been started if necessary. Subsequent follow-up determined the Startup Main Feedwater Pump was not damaged as a result of the earlier pump trip. PAE02 could have been restarted if necessary to maintain S/G level. Therefore, this event did not present a risk to public health and safety.

PREVIOUS OCCURRENCES:

No previous occurrences were identified.

FOOTNOTES:

The system code listed below is from IEEE Standard 805-1984.

1. System, SJ Component, P
2. System, SD Component, ISV
3. System, BA Component, P
4. System, SJ Component, ISV