NRC FORM 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 04/30/98
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.

LICENSEE EVENT REPORT (LER)

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

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Clinton Power Station	05000461	1 OF 4

TITLE (4)
Failure to Complete Technical Specification 3.8.2 LCO Required Action B.4 Caused by Personnel Error

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
									None	05000
01	21	97	97	002	01	08	28	97	FACILITY NAME	DOCKET NUMBER
									None	05000

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)					
	5		20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)
POWER LEVEL (10)			20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)
	000		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	TELEPHONE NUMBER (Include Area Code)
H. E. Bouska, Shift Supervisor	(217) 935-8881, Extension 3369

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).	X	NO				

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

On January 21, 1997, the plant was in Mode 5 (REFUELING) and the Division II Emergency Diesel Generator (EDG) was available but inoperable. The Operations staff performed Clinton Power Station (CPS) procedure 9080.01, "Diesel Generator 1A(B) Operability-Manual and Quick Start Operability," on the Division I EDG which caused the EDG to be inoperable as a result of performing the prestart checks on the EDG. Technical Specification 3.8.2 Limiting Condition for Operation (LCO) Required Action B.4 requires that with the Division I and II EDGs inoperable, one EDG be restored to an operable status immediately when both Division I and II are inoperable. Not immediately restoring one EDG to an operable status during performance of CPS procedure 9080.01 was contrary to the Technical Specifications. The cause of this event was an error by the Operations Shift Supervisor when the determination was made that making the EDG inoperable during the performance of CPS procedure 9080.01 was allowed by the Technical Specifications. The corrective action for this event includes training appropriate Operations Department personnel on this event and revising CPS procedure 9080.01 to not require barring over the EDG under these circumstances.

NRC FORM 366

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Clinton Power Station	05000461	97	002	00	2 OF 4

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

DESCRIPTION OF EVENT

On January 21, 1997, the plant was in Mode 5 (REFUELING) and the sixth refueling outage (RF-6) was in progress. Reactor [RCT] coolant temperature was being maintained between 75 and 85 degrees Fahrenheit. The reactor pressure vessel head was removed and the pool level over the reactor pressure vessel was being maintained at greater than 23 feet above the reactor pressure vessel flange. The Operations Shift Supervisor's review of the schedule for surveillance testing revealed that Clinton Power Station procedure number 9080.01, "Diesel Generator 1A(B) Operability-Manual and Quick Start Operability," for the Division I emergency diesel generator (EDG) [DG], which is required to be performed every 31 days, was overdue, but had not exceeded the twenty-five percent overrun by Technical Specification Surveillance Requirement (SR) Applicability 3.0.2.

The Operations Shift Supervisor was reviewing the outage schedule and identified that the schedule showed that activities to reinstall the reactor vessel head were scheduled to begin during the upcoming week. This would require that the pools over the vessel be drained so the reactor vessel head could be reinstalled. The Operations Shift Supervisor decided to investigate when the safest possible time to perform the Division I EDG surveillance test would be because the surveillance test would exceed its required testing frequency on January 30, 1997. The Division II EDG was inoperable but available. The Division II EDG was not expected to be restored to an operable status in the next 10 days. The Operations Shift Supervisor discussed the proper time to perform the surveillance test with the Assistant Director Plant Operations, and the Lead Plant Scheduler, who is responsible for evaluating the day-to-day schedule for shutdown safety and conservatism. The Operations Shift Supervisor discussed the impact on shutdown safety and Emergency Core Cooling Systems (ECCS) with the Line Assistant Shift Supervisor prior to performing the surveillance procedure for the Division I EDG. On January 21, 1997, at about 1556 hours, the Operations staff began the Division I EDG prestart checks required by CPS procedure 9080.01. At about 1624 hours, operators placed the Division I EDG lockout switch [HS] in "Maintenance" to allow barring over of the Division I EDG per CPS procedure 9080.01. This action caused the Division I EDG to become inoperable. It was acknowledged in the control room operator's log that the Division I EDG was inoperable, but the log entry stated that no limiting condition for operation (LCO) was entered. At about 1649 hours, the Division I EDG lockout switch was restored to "Normal", restoring the Division I EDG to an operable status.

On January 22, 1997, a member of the work activities group, a licensed senior reactor operator, while conducting a routine review of the control room operator's log, questioned the Operations Shift Supervisor on duty on why an LCO Action had not been entered during the performance of CPS procedure 9080.01 completed on the previous day. The Operations Shift Supervisor responded that an LCO Action should have been entered and that the log needed to be changed to reflect that an LCO Action was entered. The Operations Shift Supervisor directed the log entry be corrected to reflect entry into Technical Specification 3.8.2 LCO Condition B. Required Action B.4 of this LCO requires that when both Division I and II EDG are inoperable, that the operator immediately "initiate action to restore required DG to OPERABLE status." The Operations Shift Supervisor had reviewed this prior to performing the surveillance test but believed that performing the

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Clinton Power Station	05000461	97	002	00	3 OF 4

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

surveillance to maintain the Division I EDG in an operable condition fulfilled this Required Action. Subsequent discussions with a Licensing Department engineer concluded that by continuing to perform the Division I EDG surveillance test while the Division II EDG was inoperable did not fulfill this Required Action and therefore was contrary to Technical Specification 3.8.2. This was partially based on the statement in the bases for Technical Specification SR 3.8.2.1 which states that the operable EDG should not be, "otherwise rendered inoperable during the performance of Surveillance Requirements."

No automatic or manually initiated safety system responses were necessary to place the plant in a safe and stable condition. No other equipment or components were inoperable at the start of this event to the extent that their inoperable condition contributed to this event.

CAUSE OF EVENT

The cause of this event was a mindset by the Operations Shift Supervisor that it was necessary to enter LCO 3.8.2 in the near future because the surveillance was about to exceed its required interval for performance. The Operations Shift Supervisor, because of this mindset, believed that by performing the surveillance test the Technical Specification LCO action to "immediately" restore the EDG to an operable status was being satisfied. However, the Division I EDG was not yet inoperable and therefore, was not being restored to an operable status.

CORRECTIVE ACTION

Training was provided to appropriate Operations Department personnel on this event. This training emphasized that a thorough review of the Technical Specifications should be performed in this type of situation. Also, CPS procedure 9080.01 will be revised to remove the requirement to bar over the EDG while the plant is shutdown if either the Division I or Division II EDG is inoperable.

ANALYSIS OF EVENT

This event is reportable under the provisions of 10CFR50.73(a)(2)(i)(B) because of the failure to properly implement Technical Specification LCO 3.8.2 Required Action B.4 to immediately "initiate action to restore required DG to OPERABLE status."

Both Division I and Division II EDG were inoperable for about 25 minutes before restoring the Division I EDG to an operable status.

Analysis of the safety consequences and implications of this event identified that this event was not nuclear safety significant. The EDG was only inoperable for about twenty-five minutes and could have easily been restored at any time by the local operator. Also, during the surveillance testing the required offsite power supplies would be operable. Therefore, at least one source of offsite power was available, as well as the ability of operators to quickly restore the EDG to an operable status, if required.

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Clinton Power Station	05000461	97	002	00	4 OF 4

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

ADDITIONAL INFORMATION

No equipment or components failed during this event.

There were no other occurrences in recent history of intentionally entering a Technical Specification LCO and not properly implementing the required actions.

For further information regarding this event, contact H. E. Bouska, Shift Supervisor, at (217) 935-8881, extension 3369.