

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) **JAMES A. FITZPATRICK NUCLEAR POWER PLANT** DOCKET NUMBER (2) **050003333** PAGE (3) **1 OF 02**

TITLE (4) **Failure to Perform Surveillance Test as a Result of Technical Specification Misinterpretation**

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)																																																			
12	07	87	87	01	90	01	06	88			050000																																																			
<table border="1"> <tr> <td colspan="3">OPERATING MODE (9)</td> <td colspan="9">THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more of the following) (11)</td> </tr> <tr> <td colspan="3">POWER LEVEL (10)</td> <td>20.402(b)</td> <td>20.406(a)</td> <td>80.73(a)(2)(iv)</td> <td>73.71(b)</td> </tr> <tr> <td colspan="3">100</td> <td>20.406(a)(1)(ii)</td> <td>80.30(a)(1)</td> <td>80.73(a)(2)(v)</td> <td>73.71(a)</td> </tr> <tr> <td colspan="3"></td> <td>20.406(a)(1)(iii)</td> <td>80.30(a)(2)</td> <td>80.73(a)(2)(vii)</td> <td rowspan="4">OTHER (Specify in Abstract below and in Text, NRC Form 366A)</td> </tr> <tr> <td colspan="3"></td> <td>20.406(a)(1)(iv)</td> <td>X 80.73(a)(2)(i)</td> <td>80.75(a)(2)(viii)(A)</td> </tr> <tr> <td colspan="3"></td> <td>20.406(a)(1)(v)</td> <td>80.73(a)(2)(ii)</td> <td>80.73(a)(2)(viii)(B)</td> </tr> <tr> <td colspan="3"></td> <td>20.406(a)(1)(vi)</td> <td>80.73(a)(2)(iii)</td> <td>80.73(a)(2)(ix)</td> </tr> </table>												OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more of the following) (11)									POWER LEVEL (10)			20.402(b)	20.406(a)	80.73(a)(2)(iv)	73.71(b)	100			20.406(a)(1)(ii)	80.30(a)(1)	80.73(a)(2)(v)	73.71(a)				20.406(a)(1)(iii)	80.30(a)(2)	80.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)				20.406(a)(1)(iv)	X 80.73(a)(2)(i)	80.75(a)(2)(viii)(A)				20.406(a)(1)(v)	80.73(a)(2)(ii)	80.73(a)(2)(viii)(B)				20.406(a)(1)(vi)	80.73(a)(2)(iii)	80.73(a)(2)(ix)
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more of the following) (11)																																																											
POWER LEVEL (10)			20.402(b)	20.406(a)	80.73(a)(2)(iv)	73.71(b)																																																								
100			20.406(a)(1)(ii)	80.30(a)(1)	80.73(a)(2)(v)	73.71(a)																																																								
			20.406(a)(1)(iii)	80.30(a)(2)	80.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)																																																								
			20.406(a)(1)(iv)	X 80.73(a)(2)(i)	80.75(a)(2)(viii)(A)																																																									
			20.406(a)(1)(v)	80.73(a)(2)(ii)	80.73(a)(2)(viii)(B)																																																									
			20.406(a)(1)(vi)	80.73(a)(2)(iii)	80.73(a)(2)(ix)																																																									

LICENSEE CONTACT FOR THIS LER (12)
 NAME: **George J. Vargo**
 Radiological Engineering General Supervisor
 TELEPHONE NUMBER: **315 342-3840**

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)
 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)

ELIS Codes appear in []

On December 7, 1987, while operating at 100% power, a review of plant procedures indicated that a required test of the Standby Gas Treatment System (SGTS) [BH] was not performed as required and had not been previously performed. This test involves determining filter efficiency of the High Efficiency Particulate Air (HEPA) and charcoal filters during each scheduled Secondary Containment [NH] leak rate test.

The failure to perform this surveillance test was the result of a Technical Specification misinterpretation.

Satisfactory performance of regularly scheduled tests prior to and following Secondary Containment leak tests indicate that the event is not safety significant.

Corrective actions for this event will be a clarification of the surveillance test requirement or a technical specification change.

LER-86-009-00 is a related event.

8801120268 880106
 PDR ADOCK 05000333
 S PDR

IE 22/1

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) JAMES A. FITZPATRICK NUCLEAR POWER PLANT	DOCKET NUMBER (2) 0 5 0 0 0 3 3 3 8 7	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		8 7	0 1 9	0 0	0 2	OF 0 2

TEXT (If more space is required, use additional NRC Form 305A's) (17)

EIIS Codes appear in []

EVENT DESCRIPTION

During normal power operation at 100% rated power on December 7, 1987, at approximately 1600, the plant staff became aware that a required test of the High Efficiency Particulate Air (HEPA) and charcoal filter efficiency of the Standby Gas Treatment System (SGTS) [BH] had not been performed as required. This discovery was made during a review of the filter efficiency test procedure.

EVENT ANALYSIS AND SAFETY SIGNIFICANCE

Technical specification 4.7.B.1.b requires that "At least once during each scheduled Secondary Containment leak rate test, whenever a filter is changed, whenever work is performed that could effect the filter system efficiency, and at intervals not to exceed six months between refueling outages, it shall be demonstrated that : (1) The removal efficiency of the particulate filters is not less than 99 percent based on a DOP test per ANSI N101.1-1972 paragraph 4.1 (2) The removal efficiency of the charcoal filters is not less than 99 percent based on a Freon test."

Historically at FitzPatrick the efficiency tests have been performed at six month intervals, following filter changes and following work that could effect the filter system efficiency. The test has not been performed, however, during scheduled Secondary Containment [NG] leak rate testing. Since every efficiency test performed prior to and following Secondary Containment leak testing has been satisfactory, there is no safety significance to the event.

CAUSE OF EVENT

The cause of this deficiency is a Technical Specification interpretation error. The plant staff interpreted this specification to imply that testing at six (6) month intervals satisfied the requirement to test filter efficiency during Secondary Containment [NG] leak rate tests.

The Secondary Containment leak rate test, F-ST-39D, Reactor Building Leak Rate Test, performed once per operating cycle prior to refueling was reviewed. The surveillance requirements contained in this procedure did not address the requirement of 4.7.B.1.b and the procedure does not contain instructions to simultaneously perform the Secondary Containment [NG] leak rate test procedure.

CORRECTIVE ACTIONS:

1. Prior to the next scheduled Secondary Containment [NG] leak rate test, currently scheduled for September 1988, the test requirement will be resolved by revising F-ST-39D to include the required testing or by submitting a Technical Specification change to modify this requirement.

SIMILAR EVENTS:

LER-86-009-00 is a related event in which surveillance was not performed due to a mis-interpretation of requirements.

James A. FitzPatrick
Nuclear Power Plant
P.O. Box 41
Lycoming, New York 13093
315 342.3840



Radford J. Converse
Resident Manager

January 6, 1988
JAFFP-88-0013

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

SUBJECT: Docket No. 50-333 Licensee Event Report: 87-019-00

Gentlemen:

In accordance with 10 CFR 50.73, enclosed is the subject Licensee Event Report.

If there are any questions concerning this report, please contact George J. Vargo at (315) 349-6706.

A handwritten signature in cursive script, appearing to read 'R. Converse'.

RADFORD J. CONVERSE

RJC:GJV:emd

CC: Document Control Center
RMS - WPO
PORC Members
NRC Resident Inspector
INPO - Records Center
ANI - ANI Library ATTN: Dottie Sherman
NRC Region 1 Office, ATTN: W.T. Russell, Regional Administrator
LER/OR File (PORC Secretary (5 copies)
J. Lyons
J. Cook
Training Superintendent
Correspondence File

"CERTIFIED MAIL - RETURN RECEIPT REQUESTED"

CERTIFIED NO.
P 733061160

IE22
1/1