

LICENSEE EVENT REPORT (LER)

Facility Name (1) Byron, Unit 2 Docket Number (2) 0 5 0 0 0 4 5 5 Page (3) 1 of 0 3

Title (4) VIOLATION OF UNIT 2 LICENSE CONDITION 2.C.3 DUE TO 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 Names	Docket Number(s)
0 8	1 9	8 7	8 7	0 1 3	0 0	0 9	1 7	8 7	NONE	0 5 0 0 0 1 1
										0 5 0 0 0 1 1

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)			
POWER LEVEL (10)	0 9 4	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 20.405(a)(1)(iii)
		<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.36(c)(1)
		<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(vi)	<input type="checkbox"/> 50.73(a)(2)(vii)
		<input type="checkbox"/> 50.73(a)(2)(viii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(C)	<input checked="" type="checkbox"/> Other (Specify in Abstract below and in Text)

LICENSEE CONTACT FOR THIS LER (12)

Name T. K. Higgins, Unit Common Operating Engineer Ext. 2215 TELEPHONE NUMBER 8 1 5 2 3 4 - 5 4 4 1

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) \_\_\_\_\_

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

Startup Test 2.45.80, Incore Flux Mapping System Checkout was performed in Modes 3, 4, and 5. FSAR Table 14.2-67 which describes this test indicates that the test will be performed in Mode 4. This deviation from the FSAR description was not reported to the Commission within one month as required by Byron Unit 2 Operating License NPF-66 Condition 2.C.3. The causes of this event were cognitive personnel errors by the corporate engineer responsible for reviewing the test and the station engineer performing the 10CFR 50.59 evaluation. A memorandum was issued to the Corporate Engineering Group responsible for test reviews to emphasize the need for immediate notification of the Licensing Groups when any issue regarding FSAR items not satisfied. There have been no previous occurrences.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [xx]

A. PLANT CONDITIONS PRIOR TO EVENT:

Event Date/Time 8-19-87 / 1500

Unit 2 MODE 1 - Power Operating Rx Power 94% RCS [AB] Temperature/Pressure Normal Operating

B. DESCRIPTION OF EVENT:

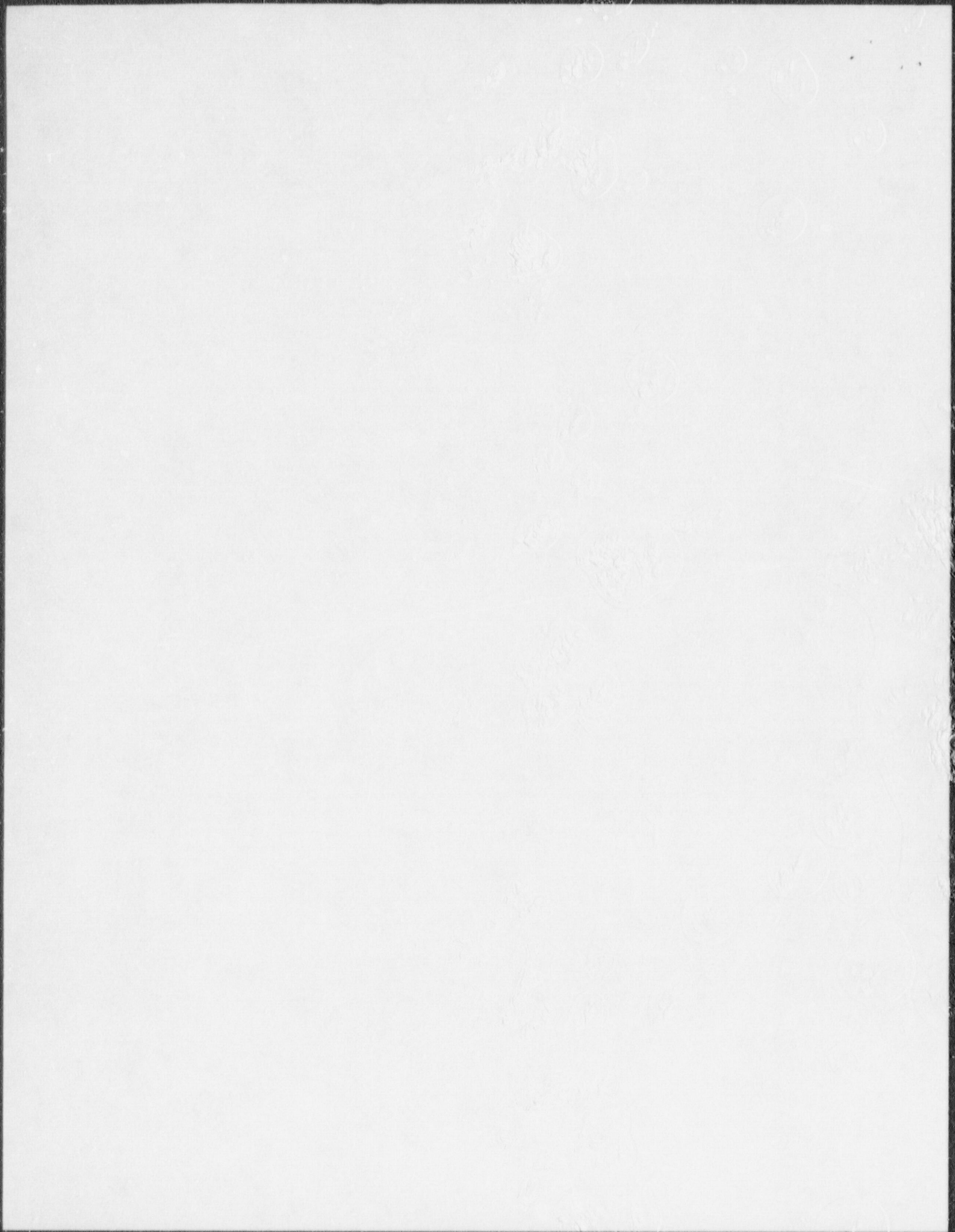
Byron Unit 2 Operating License NPF-66 Condition 2.C.3 requires reporting of changes to the Initial Startup Test Program as described in FSAR Chapter 14 in accordance with 10CFR 50.59(b) within one month of such change. Contrary to this, Startup Test 2.45.80 Incore Flux Mapping System Checkout was not performed in Technical Specification Mode 4 - Hot Shutdown as described in the FSAR Table 14.2-67 test abstract. The test was performed between the dates of 12-9-86 and 1-2-87 in Modes 3, 4, and 5. The portions of the test performed in Modes 4 and 5 did not involve detector motion. The portion of the test involving detector drive cable motion was performed in Mode 3 only. The failure to perform the test only in Mode 4 was discovered during post test results contractor review on 2-13-87. This item was evaluated by Commonwealth Edison Company Project Engineering and documented on 6-26-87 and 7-1-87 as fully meeting the intent of FSAR Table 14.2-67 requirements and was dispositioned as not reportable. Subsequently, Byron Station determined on 8-19-87 that the reporting requirements of license condition 2.C.3 were not met within the specified one month interval.

C. CAUSE OF EVENT:

The causes of this event were cognitive personnel errors by the station engineer performing the 50.59 evaluation and the corporate engineer performing the post test review. The deviation between actual test performance and FSAR Table 14.2-67 test abstract was discovered during post test review and Project Engineering requested Byron Station to perform a 10CFR50.59 review to be sent to Project Engineering. The engineer erred in completing the 10CFR50.59 review in the section of the review that addressed whether or not the item under review constituted a change to the procedure as described in the FSAR. The engineer marked this as "no" believing that the intent of the FSAR table was met. This allowed the 10CFR50.59 review to slip through the FSAR change screening process at the Station. The deviation was not reported to Nuclear Licensing by Project Engineering due to the same FSAR intent interpretation. A subsequent appraisal indicated that while the intent of the FSAR was met the license condition requirement was not rigorously obeyed.

D. SAFETY ANALYSIS:

There was no adverse safety impact by failing to report the testing deviation from the FSAR test description. As described in the 10CFR50.59 review of the deviation the actual test performance more closely duplicated actual operating conditions and thus better demonstrated proper system functions than if performed in accordance with the FSAR table. The Incore Flux Mapping System is not safety related and has no dependence on Technical Specification operating mode with regard to allowed, required, or prohibited conditions for system operation.



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E. CORRECTIVE ACTIONS:

Because all testing is now complete and all Station test reviews are complete there is no direct action for Byron Station to perform. A memorandum has been issued to Project Engineering to emphasize the need for Project Engineering to immediately contact Byron Station regarding any FSAR items not satisfied, to ensure prompt reporting. The normal procedure is for Project Engineering to generate their own 10CFR50.59, determine reportability, and contact corporate Nuclear Licensing for NRC reporting, without direct Station involvement.

F. PREVIOUS OCCURRENCES:

<u>LER NUMBER</u>	<u>TITLE</u>
NONE	

G. COMPONENT FAILURE DATA:

a)	<u>MANUFACTURER</u>	<u>NOMENCLATURE</u>	<u>MODEL NUMBER</u>	<u>MFG PART NUMBER</u>
	Not Applicable			

b) RESULTS OF NPRDS SEARCH:  
N/A

USNRC-DS  
1987 SEP 24 A 10: 14



**Commonwealth Edison**  
Byron Nuclear Station  
4450 North German Church Road  
Byron, Illinois 61010

September 17, 1987

LTR: BYRON 87-0960

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20555

Dear Sir:

The enclosed Licensee Event Report from Byron Generating Station is being transmitted to you in accordance with the requirements of Byron Unit 2 Operating License NFP-66 Condition 2.C.3.

This report is number 87-013-00; Docket No. 50-455

Very truly yours,

R. E. Querio  
Station Manager  
Byron Nuclear Power Station

REQ/RAC/bf

Enclosure: Licensee Event Report No. 87-013-00

cc: A. Bert Davis, NRC Region III Administrator  
P. Brochman, NRC Senior Resident Inspector  
INPO Record Center  
CECO Distribution List

#3/017

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