

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Perry Nuclear Power Plant, Unit 1										DOCKET NUMBER (2) 0 5 0 0 0 4 4 0										PAGE (3) 1 OF 03																													
TITLE (4) Personnel Error Results In A Violation of Technical Specification Due To The Plant Exceeding 150 PSIG With The Reactor Core Isolation Cooling System Inoperable																																																	
EVENT DATE (5) MONTH DAY YEAR 1 1 1 4 8 7 8 7										LER NUMBER (6) YEAR SEQUENTIAL NUMBER REVISION NUMBER 0 7 5 0 0 1 2 1 4 8 7										REPORT DATE (7) MONTH DAY YEAR 1 4 8 7										OTHER FACILITIES INVOLVED (8) FACILITY NAMES DOCKET NUMBER(S) 0 5 0 0 0																			
OPERATING MODE (9) 2										THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more of the following) (11)																																							
POWER LEVEL (10) 0 0 2										20.402(b) 20.406(a)(1)(i) 20.406(a)(1)(ii) 20.406(a)(1)(iii) 20.406(a)(1)(iv) 20.406(a)(1)(v)										20.406(c) 50.36(c)(1) 50.36(c)(2) 50.73(a)(2)(i) 50.73(a)(2)(ii) 50.73(a)(2)(iii) 50.73(a)(2)(iv)										50.73(a)(2)(iv) 50.73(a)(2)(v) 50.73(a)(2)(vi) 50.73(a)(2)(vii)(A) 50.73(a)(2)(vii)(B) 50.73(a)(2)(viii)(B) 50.73(a)(2)(ix)										73.71(b) 73.71(c) OTHER (Specify in Abstract below and in Text, NRC Form 366A)									
LICENSEE CONTACT FOR THIS LER (12) NAME Gregory A. Dunn, Compliance Engineer, Extension 6484																														TELEPHONE NUMBER AREA CODE 2 1 6 2 5 9 1 3 7 3 7																			
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																																																	
CAUSE SYSTEM COMPONENT MANUFACTURER REPORTABLE TO NRCDS										CAUSE SYSTEM COMPONENT MANUFACTURER REPORTABLE TO NRCDS																																							
SUPPLEMENTAL REPORT EXPECTED (14) YES (If yes, complete EXPECTED SUBMISSION DATE (E)) X NO																														EXPECTED SUBMISSION DATE (15) MONTH DAY YEAR																			

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

On November 14, 1987 at approximately 0245, the plant operated with the reactor pressure greater than 150 psig for approximately 45 minutes with the Reactor Core Isolation Cooling (RCIC) system inoperable. This was in violation of the requirements of Technical Specification 3.7.3 for operability of the RCIC system.

The cause of this event was personnel error. The Shift Supervisor (SS) incorrectly determined that RCIC was not required to be operable for up to 12 hours after exceeding 150 psig reactor pressure. This was due to a misinterpretation of the single asterisk footnote in Technical Specification 3.7.3 and a failure to utilize available resources, including the Technical Specifications, to correctly answer the RCIC Operability question. Personnel statements and interviews with other licensed operators on shift indicate that this misinterpretation is not a widespread concern.

The SS involved in this event has received disciplinary action. In addition, all licensed operators will be formally trained on the sequence of events which led to this report, with emphasis on the responsibility to utilize all available resources to ensure Technical Specification compliance.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

On November 14, 1987 at approximately 0245, the plant operated with the reactor vessel [RPV] pressure greater than 150 psig for approximately 45 minutes with the Reactor Core Isolation Cooling (RCIC) system [BN] inoperable. This was in violation of the requirements of Technical Specification 3.7.3 for operability of the RCIC system. At the time of the event, the plant was in Operational Condition 2 (Startup) at approximately 2 percent of rated thermal power and RPV pressure 150 psig.

On November 13, 1987 at 1735, control room operators commenced performance of Integrated Operating Instruction (IOI)-1 "Cold Startup." At 1800 Operational Condition 2 was entered, and at 2116 criticality was achieved. At approximately 2300, RPV pressure reached 60 psig. At this time, warmup of the RCIC steam piping and placement of the RCIC system in standby readiness may be commenced. The control room operators commenced RCIC steam piping warmup, but they did not place the RCIC system in standby readiness to declare it Operable at this time. Prior to exceeding 150 psig, on November 14 at approximately 0245, a control room Supervising Operator (SO) discussed the requirements of RCIC operability in Technical Specification 3.7.3 with the Shift Supervisor (SS). A determination was made that RCIC was not required to be Operable for up to 12 hours after exceeding 150 psig reactor pressure. Therefore, the RCIC system remained in the secured status and warmup of the RCIC steam piping continued.

At approximately 0330, the Unit Supervisor (US) reviewed the control room panels and observed RCIC in the secured status with RPV pressure approximately 180 psig. At this time, the US and SS reviewed the applicable RCIC Technical Specifications and realized an error had been made. The SOs were then instructed to reduce reactor pressure below 150 psig and to place RCIC in the standby readiness condition. RCIC was placed in standby readiness and declared Operable at approximately 0402.

The cause of this event was personnel error. Technical Specification 3.7.3 requires that the RCIC system be operable in Operational Condition 1, 2 and 3 with reactor pressure greater than 150 psig. The SS incorrectly determined that RCIC was not required to be Operable for up to 12 hours after exceeding 150 psig reactor pressure based upon a single asterisk footnote. This footnote provides for the plant to operate at greater than 150 psig for up to 12 hours for the performance of two RCIC Technical Specification flow performance tests. The SS's recall of this footnote applicability was incorrectly interpreted resulting in the Technical Specification violation. In addition, available resources were not utilized to correctly answer the RCIC operability question nor were the Technical Specifications referenced. Personnel statements and interviews with the other licensed operators on shift indicate that this misinterpretation of Technical Specification 3.7.3 is not a widespread concern.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
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NOTE: If more space is required, use additional NRC Form 386A's (17)

The RCIC system is designed to maintain sufficient reactor water inventory should the vessel lose feedwater supply during a reactor vessel isolation condition. With the RCIC system unavailable, the High Pressure Core Spray (HPCS) system [BG] provides protection against a single failure event by performing the redundant function of maintaining reactor water inventory and adequate core cooling. RCIC is not classified as the Emergency Core Cooling System. Since the maximum RPV pressure was 180 psig, the Low Pressure Core Spray (LPCS) system [BM] and the Low Pressure Coolant Injection (LPCI) mode of the Residual Heat Removal (RHR) [BO] were also available to provide spray cooling and maintain reactor water inventory. For these reasons, this event is not considered safety significant. No previous similar events were identified.

The SS involved in this event has received disciplinary action. In addition, all licensed operators will be formally trained on the sequence of events which led to this report, with emphasis on the responsibility to utilize all available resources to ensure Technical Specification compliance.

Energy Industry Identification System Codes are identified in the text as [XX].