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CALVERT CLIFFS NUCLEAR POWER PLANT DEPARTMENT
CALVERT CLIFFS NUCLEAR POWER PLANT
LUSBY, MARYAND 20657

August 28, 1989

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

Docket No. 50-317
License No. DPR 53

Dear Sirs:

The attached LER 89-013 is being sent to you as required under 10 CFR 50.73 guidelines.

Should you have any questions regarding this report, we would be pleased to discuss them with you.

Very truly yours,

L B Russell

L. B. Russell
Manager-Calvert Cliffs Nuclear Power Plant Department

LBR:MDM:sb

cc: William T. Russell
Director, Office of Management Information
and Program Control
Messrs: G. C. Creel
C. H. Cruse

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NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Calvert Cliffs, Unit 1	0 5 0 0 0 3 1 7	1 OF 0 4

TITLE (4)
Missing Steps in Surveillance Test Procedure

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 5 0 0 0
0 7	3 1	8 9	8 9	— 0 1 3	— 0 0	0 8	2 8	8 9		0 5 0 0 0

OPERATING MODE (9)	5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)							
POWER LEVEL (10)	0 0 0		20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)
			20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)
			20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER (Specify in Abstract below and in Text, NRC Form 366A)
			20.405(a)(1)(iii)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		
			20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)		
			20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER	
	AREA CODE	
M. D. Milbradt, Engineer	3 0 1	2 6 0 - 4 3 5 2

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 fifteen single-space typewritten lines) (16)

On July 31, 1989, the Calvert Cliffs Surveillance Test Procedure (STP) Program Manager discovered our failure to fully comply with Technical Specification Surveillance 4.9.12.9.a. The surveillance requires both spent fuel exhaust fans to be run every 31 days for at least 15 minutes. The surveillance test procedure used to satisfy 4.9.12.a, STP-0-7-1, did not contain steps to test the fans.

The root cause of this event was personnel error in failing the failure to incorporate steps in STP-0-7-1 or any other surveillance procedure to test the fans. A secondary cause was the failure of the procedure review process to detect the error.

Corrective actions for this event include:

1. Immediately swapping in-service fans and running the new in-service fan for 15 minutes.
2. Incorporating steps for testing the spent fuel exhaust charcoal filters and fans in a new test procedure.
3. Performing a detailed review of test procedures used to satisfy Technical Specification Surveillance requirements.
4. Implementation of a upgraded STP program.
5. Improvement of the Quality Assurance Technical Specification audit process.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6) YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	PAGE (3)
Calvert Cliffs, Unit 1	0 5 0 0 0 3 1 7	8 9	— 0 1 3	— 0 0	0 2 OF 0 4

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

I. Description of Event

On July 31, 1989, the Calvert Cliffs Surveillance Test Procedure (STP) Coordinator discovered our failure to fully comply with Technical Specification Surveillance 4.9.12.a. The surveillance states, " At least once per 31 days . . . verifying that each charcoal absorber bank and each exhaust fan operates for at least 15 minutes". Surveillance procedure STP-0-7-1 has detailed steps ensuring the charcoal filters are run for 15 minutes, but does not test the fans.

When testing the charcoal filters, at least one spent fuel exhaust fan is required to be in-service and the filter run time is logged in the charcoal filter log book.

There was no procedural requirement to log which fan is placed in-service or to ensure each fan operates for 15 minutes.

II. Cause

The root cause of this event was personnel error. The personnel who revised STP-0-7-1, to include steps to test the filter, failed to incorporate steps in STP-0-7-1 to test the spent fuel exhaust fans. A review of the history of STP-0-7-1 shows the steps to test the filters were added in 1978 but does not state why the filters were added or why the fans were not addressed. Subsequent inadequate reviews of STP-0-7-1 was a secondary cause of this event.

The STP program at Calvert Cliffs is administered by an STP Program Manager. The program is currently being revised, but under the old program, the coordinator arranged for biennial reviews of each STP. The review was designed to verify the procedure was written properly and accomplished the requirements of Technical Specification Surveillance. The review of STP-0-7-1 was last performed in December of 1988.

Additionally, a Quality Assurance (QA) audit is performed on 20% of all Technical Specifications each year. The QA audit on Surveillance 4.9.12.a was last performed in 1985.

Both the post STP-0-7-1 reviewers and the QA auditors failed to note the fans were not being tested.

III. Analysis

At least one of the two spent fuel exhaust fans is normally in service. The fan(s) must be operable whenever irradiated fuel is in the spent fuel storage pool.

The intent of surveillance 4.9.12.a is to ensure both fans are operable. One fan normally in-service at all times proves operability for that fan. The second fan is placed in-service every 3 months when the Maintenance Department removes the running fan for scheduled inspections. Based on this regularly scheduled maintenance task, we are confident both fans have been run for 15 minutes at least every 3 months.

The spent fuel exhaust system is assumed to be operable during the Fuel Handling Incident, described in Chapter 14 of the Calvert Cliffs' FSAR. At least one fan is required during the accident.

The potential consequences of not running each fan for 15 minutes every 31 days are minimal due to other operability assurances like keeping a fan in-service continuously and performing periodic maintenance inspections.

IV. Corrective Actions

Immediate

Upon discovery of the event, the Shift Supervisor was notified and the fans were swapped. The new in-service fan was run for at least 15 minutes.

Long Term

The following long term corrective actions have been identified:

1. The steps for testing the spent fuel charcoal filters have been removed from STP-0-7-1. A new STP, incorporating steps to run the filters and the fans, has been issued.

2. A detailed review of all procedures used to satisfy Technical Specification Surveillance requirements is currently in progress. The review will ensure each surveillance is fully covered by a procedure.

3. The STP program is being upgraded. The program will assign Functional Surveillance Test Coordinators (FSTC) responsibility for overseeing and maintaining the Surveillance Test Procedures assigned to them. The FSTC will ensure that Technical Specification Surveillance requirements are addressed by those procedures. All new Surveillance Test Procedures will be generated and reviewed using strict guidelines designed to ensure surveillance compliance. New procedure reviews and biennial reviews of each STP will consist of two parts. The first part will be a technical review by a System/Component Engineer. The second part will be a functional review by the department responsible for performing the procedure.

4. The QA Technical Specification audit process has been improved. The audit process has become more technically oriented and the audit checklist has been expanded.

V. Additional Information

Related Events

LERs 318/88-006, 317/89-001, and 317/89-010 involved Technical Specification Surveillance requirements that were not performed. The root cause of LERs 318/88-006, and 317/89-010 was personnel scheduling oversight and misinterpretation. The missed surveillance described in LER 317/89-001 was due to a missing page in the test procedure.

Component Identification

Component	IEEE 803 EIIS Funct.	IEEE 805 System ID
Spent Fuel Exhaust:		
Charcoal Filter	FLT	VG
Exhaust Fan	FAN	VG

*U.S. GPO: 1988-520-589/00070