NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION (6-1998)							EXPIRES 06/30/2001											
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines 16)

(If yes, complete EXPECTED SUBMISSION DATE)

On September 26, 1999, it was discovered that lifted leads that defeated the output of one of the Reactor Recirculation flow converters to the Average Power Range Monitors (APRM) placed the facility in a condition where a single failure would have prevented the flow biased simulated thermal power upscale Reactor Protection System trip required by Technical Specification 3/4.3.1.

**DATE (15)** 

The root cause of this event was a fundamental knowledge based error for failure to recognize the inoperable APRMs. Corrective actions include conducting tailgate sessions with operations personnel regarding APRM operability with respect to the thermal power upscale trip, and reviewing the Station training program to ensure that it includes the appropriate level of detail regarding APRM operability and the flow converter.

The safety significance of this event was minimal. Two flow units are routed through a low value gate to each APRM, which provides input to the thermal power upscale trip. The other flow unit was operable and provided the flow signal to the thermal power upscale trip.

This event is reportable per 10 CFR 50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.

# LICENSEE EVENT REPORT (LER)

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#### PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor, 3323 Megawatts Thermal Rated Core Power

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

# A. CONDITION PRIOR TO EVENT

Unit(s): 1 Event Date: 09/26/99 Event Time: 0200 Hours

Reactor Mode(s): 1 Power Level(s): 087

Mode(s) Name: Run

#### B. DESCRIPTION OF EVENT

Beginning on April 5, 1999, during the execution of surveillance LIS-NR-107, "Unit 1 APRM/RBM Flow Converter to Total Core Flow Adjustment," unexpected half-scrams occurred intermittently. Work Request (WR) 990071531-01 was prepared to determine the cause. Efforts subsequently narrowed the source of the intermittent half-scrams to "C" flow converter and determined that the problem only occurred during performance of the surveillance. The faulty component inside the flow converter has not yet been determined. The flow converters are scheduled to be replaced during refueling outage L1R08, scheduled for October 1999. Based on both zero tolerance for inadvertent half-scrams and the need to perform testing weekly, the station decided that output leads would be lifted from "C" flow converter while performing LIS-NR-107. This prevents inadvertent half-scrams and facilitates monitoring "C" flow converter's output during the surveillance. The leads were lifted only for the duration of the surveillance (less than 1 hour). The Updated Final Safety Analysis Report (UFSAR) states that a single flow unit may be removed from service for a short time. This activity has been evaluated as acceptable since the flow unit was out-of-service (OOS) for less than the allowed outage time of 6 hours specified in Technical Specification (TS) Table 3.3.1-1, "Reactor Protection System Instrumentation" Note (a).

Separately, installation activities associated with the Oscillation Power Range Monitor (OPRM) modification were in progress. During installation, an inadvertent half-scram was generated that was suspected to originate from bumping a flow converter while passing materials through the panel. To prevent recurrence during future OPRM channel installations, and because a flow converter lead was lifted under the work package mentioned previously, it was decided to incorporate the same lead-lifting solution for each OPRM channel installation. Thus the work plans for the remaining OPRM channel installations were amended to include lifting the corresponding flow converter leads either in the work package or in the OOS.

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In the Operating Department review of the OPRM installation, it was recognized that the flow converters are addressed in TS 3/4.3.6, "Control Rod Block Instrumentation" and one of two flow converters are required per trip function. TS 3/4.3.1, "Reactor Protection System Instrumentation" does not specifically address flow converter operability; rather it is implicitly included via the surveillance requirements and the definition of operability.

On September 26, 1999, during a review of an OPRM modification OOS prior to its implementation, a Senior Reactor Operator (SRO) questioned the removal of the redundant flow converter from service without declaring the flow biased simulated thermal power upscale trip and rod block inoperable. Further review of the operability requirements determined that two flow converters must be operable for the trip to be operable. Problem Identification Form (PIF) L1999-04533 was submitted, and the OOS was not used. The work was subsequently completed without lifting the leads.

The work packages for the OPRM modifications that had already been used were reviewed. Installation associated with "D" and "E" APRMs used the lifted lead methodology. The leads were lifted for "D" APRM under WR No. 990009261. This work started on August 30, 1999 and was completed on September 15, 1999, but it was interrupted by a Unit scram and restart and the leads restored from September 2, 1999 until September 13, 1999. This resulted in the leads being lifted for the "D" APRM for an estimated 150 hours. The leads were lifted for the "E" APRM under OOS No. 990009150 which was installed on September 22, 1999, at 0743 hours, and was removed on September 25, 1999, at 0632 hours, for a duration of 71 hours. These activities resulted in exceeding the allowed outage time (AOT) for the flow biased simulated thermal power upscale trip.

This is reportable pursuant to 10 CFR 50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.

#### C. CAUSE OF EVENT

The root cause of this event was a fundamental knowledge based error for failure to recognize the inoperable APRMs. Station knowledge did not go to this level of detail for APRM operability relating to the flow units.

### D. SAFETY ANALYSIS

The safety significance of this event was minimal. Two flow units are routed through a low value gate to each APRM, which provides input to the thermal power upscale trip. The other flow unit was operable and provided the flow signal to the thermal power upscale trip. The APRM flow biased thermal trip is not credited in any transient analysis for the current cycle.

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#### E. CORRECTIVE ACTIONS

#### Corrective Actions to Prevent Recurrence:

- 1. Tailgate sessions have been held with Operations personnel regarding this event, operability of APRMs with respect to the flow unit inputs, and the requirements of 10 CFR 50.59 (complete).
- 2. A needs analysis will be performed to ensure that the station personnel training program includes the appropriate level of detail regarding TS 3/4.3.1 and the requirement for both flow converters to be operable in order for the flow biased thermal trip to be operable (ATM# 16802-24).

# F. PREVIOUS OCCURRENCES

A review of the past five years of LERs found no previous occurrences of a system rendered inoperable in excess of its allowed outage time by improperly lifted leads.

### G. COMPONENT FAILURE DATA

Since no component failures occurred, this section is not applicable.