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December 13, 1999

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 50-387/99-007-00
PLA - 5141 FILE R41-2

Docket No. 50-387
License No. NPF-14

Attached is Licensee Event Report 50-387/99-007-00. This report is being made pursuant to 10CFR50.73(a)(2)(i)(B), in that a twelve hour surveillance requirement was being performed on a twenty-four hour frequency.

A handwritten signature in black ink that reads "Robert F. Saunders". The signature is written in a cursive, flowing style.

Robert F. Saunders
Vice President - Nuclear Site Operations

Attachment

cc: Mr. H. J. Miller
Regional Administrator
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. S. L. Hansell
Sr. Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 35
Berwick, PA 18603-0035

IE22

PDR ADDA 05000387

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

Susquehanna Steam Electric Station - Unit 1

DOCKET NUMBER (2)

05000387

PAGE (3)

1 OF 3

TITLE (4)

Incorrect Surveillance Frequency Due To Improved Technical Specifications Implementation 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 NAME	DOCKET NUMBER
11	11	99	99	-- 007	-- 00	12	13	99	Susquehanna SES Unit 2	05000388
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9)	POWER LEVEL (10)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)								
1	100	20.2201(b)	20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	50.73(a)(2)(i)	50.73(a)(2)(viii)				
		20.2203(a)(1)	20.2203(a)(3)(i)		50.73(a)(2)(ii)	50.73(a)(2)(x)				
		20.2203(a)(2)(i)	20.2203(a)(3)(iii)		50.73(a)(2)(iii)	73.71				
		20.2203(a)(2)(ii)	20.2203(a)(4)		50.73(a)(2)(iv)	OTHER				
		20.2203(a)(2)(iii)	50.36(c)(1)		50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A				
		20.2203(a)(2)(iv)	50.36(c)(2)		50.73(a)(2)(vii)					

LICENSEE CONTACT FOR THIS LER (12)

NAME

Gerard M. Machalick - Senior Engineer, Licensing

TELEPHONE NUMBER (include Area Code)

570 / 542-3861

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

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 15 single-spaced typewritten lines) (16)

On November 11, 1999, with Unit 1 in Mode 1 (Power Operation) at 100% power and Unit 2 in Mode 1 (Power Operation) at 100% power, operations personnel (utility, licensed) discovered that calculation of Reactor Coolant System (RCS) total leakage was being performed every 24 vice every 12 hours as required by Technical Specifications Surveillance Requirement 3.4.4.1. The surveillance requirement had been changed when the station implemented Improved Technical Specifications (ITS) on October 2, 1998. The more restrictive frequency was not identified in the ITS implementation, and was incorrectly classified as "Less Restrictive" during the ITS evaluation and implementation. As a result, the revision to the surveillance procedure associated with ITS implementation did not include the correct surveillance frequency for the RCS total leakage. Historical RCS leakage data shows that the limits were not exceeded. Therefore, the safety significance of this situation is low and the health and welfare of the public was not compromised. This event is reportable per 10CFR50.73(a)(2)(i)(B). Surveillance procedures for Unit 1 and Unit 2 have been revised to reflect the correct surveillance frequency. A sampling of ITS requirements characterized as "Less Restrictive" will be conducted to determine if additional categorization errors may exist.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Susquehanna Steam Electric Station - Unit 1	05000				2 OF 3
	387	99	-- 007	-- 00	

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

EVENT DESCRIPTION

On November 11, 1999, with Unit 1 in Mode 1 (Power Operation) at 100% power and Unit 2 in Mode 1 (Power Operation) at 100% power, operations personnel (utility, licensed) discovered that calculation of Reactor Coolant System (RCS) total leakage was being performed every 24 vice every 12 hours as required by Technical Specifications Surveillance Requirement 3.4.4.1. The surveillance requirement had been changed from three actions of 4-hour, 12-hour, and 24-hour frequencies to three actions at a single frequency of 12 hours, when the station implemented Improved Technical Specifications (ITS) on October 2, 1998. The other two actions were being conducted at the 12-hour frequency, as required.

CAUSE OF EVENT

The more restrictive frequency was not identified in the ITS implementation. This surveillance requirement was incorrectly classified as "Less Restrictive" during the ITS evaluation and implementation. As a result, the revision to the surveillance procedure associated with ITS implementation did not include the correct surveillance frequency for the RCS total leakage.

REPORTABILITY/ANALYSIS

Technical Specification 3.4.4.1 defines limits on operational RCS leakage to ensure appropriate action is taken before the integrity of the Reactor Coolant Pressure Boundary (RCPB) is impaired. The allowable RCS operational leakage limits are based on the predicted and experimentally observed behavior of pipe cracks. The unidentified leakage flow limit allows time for corrective action before the RCPB could be significantly compromised. Two of the three surveillance requirements were performed at the correct frequency, every 12 hours (verification of RCS unidentified leakage and unidentified leakage increases within limits). The third surveillance requirement, verification of total leakage within limits, was performed every 24 hours. Historical RCS leakage data shows that the limits were not exceeded. Therefore, the safety significance of this situation is low and the health and welfare of the public was not compromised. This event is reportable per 10CFR50.73(a)(2)(i)(B), operation or condition prohibited by the plant's Technical Specifications.

In accordance with the guidelines provided in NUREG-1022, Revision 1, the required submission date for this report is December 13, 1999.

CORRECTIVE ACTIONS

Corrective actions that have been completed are:

- Surveillance procedures for Unit 1 and Unit 2 have been revised to reflect the correct surveillance frequency.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Susquehanna Steam Electric Station - Unit 1	05000 387	99	-- 007 --	00	3 OF 3

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

Corrective actions that are to be completed are:

- Conduct a sampling of ITS requirements characterized as "Less Restrictive" to determine if additional categorization errors may exist.

ADDITIONAL INFORMATION

Past Similar Events: No other events of inadequate surveillance frequency have occurred due to conversion to ITS.

Failed Component: None