

R. A. Saccone
Vice President - Nuclear Operations

PPL Susquehanna, LLC
769 Salem Boulevard
Berwick, PA 18603
Tel. 570.542.3959 Fax 570.542-1504
rasaccone@pplweb.com



MAR 23 2006

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station OP1-17
Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 50-388/2006-001-00
PLA-6033**

Docket 50-388

Attached is Licensee Event Report 50-388/2006-001-00. This event was determined to be reportable per 10 CFR 50.73(a)(2)(i)(B), Condition Prohibited by Technical Specifications, because the presence of an incorrectly erected scaffold would have rendered two Unit 2 Automatic Depressurization System pressure switches inoperable during a seismic event. The scaffold was in place from February 1, 2005 to January 27, 2006. This duration exceeds the Technical Specification 3.3.5.1 allowable completion time for inoperable Emergency Core Cooling System Instrumentation.

The pressure switches are located on the Unit 2 'D' Residual Heat Removal pump discharge and provide a permissive signal to the Automatic Depressurization System when the 'D' RHR pump is running. Since the Automatic Depressurization System receives "pump running" permissive signals from numerous other input sources, the system's ability to perform its safety function was not affected.

There were no actual consequences to the health and safety of the public as a result of this event.

No new regulatory commitments have been created through issuance of this report.

Robert A. Saccone
Vice President - Nuclear Operations

Attachment

IE22

cc: Mr. S. J. Collins
Regional Administrator
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19408

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

Mr. R. Osborne
Allegheny Electric Cooperative
P. O. Box 1266
Harrisburg, PA 17108-1266

Mr. R. R. Janati
Bureau of Radiation Protection
Rachel Carson State Office Building
P. O. Box 8469
Harrisburg, PA 17105-8469

U.S. NUCLEAR REGULATORY
COMMISSION

LICENSEE EVENT REPORT (LER)

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

APPROVED BY OMB: NO. 3150-0104

EXPIRES: 06/30/2007

Estimated burden per response to comply with this mandatory collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME Susquehanna Steam Electric Station – Unit 2

2. DOCKET NUMBER

05000388

3. PAGE

1 OF 3

4. TITLE Tech Specs Not Met for Inoperable ADS Pressure Switches

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
01	25	2006	2006	001	00	03	23	2006	FACILITY NAME	DOCKET NUMBER
										05000
										05000

9. OPERATING MODE

1

10. POWER LEVEL

100%

11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)

- | | | | |
|---|---|---|--|
| <input type="checkbox"/> 20.2201(b) | <input type="checkbox"/> 20.2203(a)(3)(i) | <input type="checkbox"/> 50.73(a)(2)(i)(C) | <input type="checkbox"/> 50.73(a)(2)(vii) |
| <input type="checkbox"/> 20.2201(d) | <input type="checkbox"/> 20.2203(a)(3)(ii) | <input type="checkbox"/> 50.73(a)(2)(ii)(A) | <input type="checkbox"/> 50.73(a)(2)(viii)(A) |
| <input type="checkbox"/> 20.2203(a)(1) | <input type="checkbox"/> 20.2203(a)(4) | <input type="checkbox"/> 50.73(a)(2)(ii)(B) | <input type="checkbox"/> 50.73(a)(2)(viii)(B) |
| <input type="checkbox"/> 20.2203(a)(2)(i) | <input type="checkbox"/> 50.36(c)(1)(i)(A) | <input type="checkbox"/> 50.73(a)(2)(iii) | <input type="checkbox"/> 50.73(a)(2)(ix)(A) |
| <input type="checkbox"/> 20.2203(a)(2)(ii) | <input type="checkbox"/> 50.36(c)(1)(ii)(A) | <input type="checkbox"/> 50.73(a)(2)(iv)(A) | <input type="checkbox"/> 50.73(a)(2)(x) |
| <input type="checkbox"/> 20.2203(a)(2)(iii) | <input type="checkbox"/> 50.36(c)(2) | <input type="checkbox"/> 50.73(a)(2)(v)(A) | <input type="checkbox"/> 73.71(a)(4) |
| <input type="checkbox"/> 20.2203(a)(2)(iv) | <input type="checkbox"/> 50.46(a)(3)(ii) | <input type="checkbox"/> 50.73(a)(2)(v)(B) | <input type="checkbox"/> 73.71(a)(5) |
| <input type="checkbox"/> 20.2203(a)(2)(v) | <input type="checkbox"/> 50.73(a)(2)(i)(A) | <input type="checkbox"/> 50.73(a)(2)(v)(C) | <input type="checkbox"/> OTHER |
| <input type="checkbox"/> 20.2203(a)(2)(vi) | <input checked="" type="checkbox"/> 50.73(a)(2)(i)(B) | <input type="checkbox"/> 50.73(a)(2)(v)(D) | Specify in Abstract below
or in NRC Form 366A |

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME

Eric J. Miller -- Nuclear Regulatory Affairs

TELEPHONE NUMBER (Include Area Code)

570-542-3321

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

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED

☐ YES (If yes, complete 15. EXPECTED SUBMISSION DATE) ☒ NO15. EXPECTED
SUBMISSION
DATE

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On January 25, 2006 with Unit 2 in Mode 1 at 100% power, concerns were raised about the potential for interaction between an installed scaffold and Unit 2 'D' Residual Heat Removal pump instrument tubing. The tubing feeds two Automatic Depressurization System pressure switches that provide an ADS initiation permissive signal when the 2 'D' RHR pump is running. Analysis has conservatively concluded that scaffold movement during a dynamic event would have challenged the function of the ADS pressure switches. Accordingly, it was assumed that the ADS pressure switches were inoperable from the time of scaffold installation on February 1, 2005 to the time the scaffold was removed on January 27, 2006. This duration exceeds the Technical Specification 3.3.5.1 allowable completion times for inoperable Emergency Core Cooling System Instrumentation and is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as a Condition Prohibited by Technical Specifications. Because the pump running permissive for ADS initiation can be fulfilled from numerous alternative sources, function of the ADS was not, in itself, lost. Analysis has concluded that the scaffold program design and supervisory reinforcement of administrative requirements were less than adequate. A site-wide inspection of accessible scaffold installations did not identify adverse impacts to other station equipment. Immediate compensatory measures such as procedural changes, stand-down meetings, and personnel training and qualification verifications were undertaken. In the longer term, the station intends to revise Susquehanna's scaffold control program, provide training on the program revisions, and to implement an in-plant Maintenance management observation process intended to reinforce administrative requirements among plant workers. There were no actual adverse consequences to the health and safety of the public as a result of this event.

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Susquehanna Steam Electric Station – Unit 2	05000388	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
		2006	- 001	- 00	

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

EVENT DESCRIPTION

On January 25, 2006 with Unit 2 in Mode 1 at 100% power, concerns were raised about the potential for interaction between an installed scaffold and Unit 2 'D' Residual Heat Removal (RHR; EIS Code: BO) pump instrument tubing. The tubing feeds two Automatic Depressurization System (ADS; EIS Code: B) pressure switches that provide an ADS initiation permissive signal when the 2 'D' RHR pump is running. Analysis has conservatively concluded that scaffold movement during a dynamic event would have challenged the function of the ADS pressure switches. Accordingly, it was assumed that the ADS pressure switches were inoperable from the time of scaffold installation on February 1, 2005 to the time the scaffold was removed on January 27, 2006. This duration exceeds the Technical Specification 3.3.5.1 allowable completion times for inoperable Emergency Core Cooling System (ECCS; EIS Code: B) Instrumentation and is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as a Condition Prohibited by Technical Specifications.

CAUSE OF EVENT

Two root causes have been identified for this event:

Less than adequate scaffold program design – PPL Susquehanna's scaffold control program contains elements, such as procedural inconsistencies and insufficient training, that inhibit flawless execution.

Less than adequate reinforcement by supervision and management of administrative requirements – Supervisors and Managers of scaffold installation and inspection personnel were not reinforcing the need for workers to perform scaffold installation per procedural requirements.

ANALYSIS / SAFETY SIGNIFICANCE

Function of the Unit 2 'D' RHR pump discharge (ADS permissive) pressure switches was conservatively considered suspect because of the scaffolding in the RHR pump room. Loss of these switches removed one "pump running" permissive signal from the ADS initiation logic. However, this logic incorporates multiple redundancies (any RHR pump or Core Spray loop (CS; EIS Code: BM) in either division) that are capable of producing the pump running permissive for ADS initiation. As such, ADS would have initiated, if called upon to do so, even if a seismic event would have rendered the subject switches inoperable. The scaffold did not pose any operability concerns for the RHR system itself.

Weak programmatic controls regarding the potential impact of scaffolding on safety-related equipment did create the potential to render multiple safety-related systems, structures, and components inoperable concurrently.

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		2006	- 001	- 00	

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

CORRECTIVE ACTIONSThe following corrective actions have been completed:

- A site-wide inspection of accessible areas was initiated to identify, inspect, rework or remove scaffolding at Susquehanna. Over 100 scaffold installations were reviewed. While numerous non-compliances with scaffold procedure requirements were identified, only the situation identified in this report rendered safety-related equipment inoperable.
- The applicable procedure was revised to provide clearer guidance regarding long-term scaffolding installation and inspection requirements.
- Stand-down meetings were conducted and written communications were issued to reiterate expectations regarding use of the scaffold procedure.
- Efforts were undertaken to ensure scaffold installers and inspectors were properly trained and qualified to perform such duties.

The following corrective actions are planned:

- A cross-discipline team will evaluate and revise Susquehanna's scaffold control program.
- Training will be completed for designated scaffolding installation and inspection personnel on the revised programmatic requirements of Susquehanna's scaffold control program.
- A Maintenance management, in-plant observation process will be implemented to reinforce administrative requirements, provide coaching, and to document and trend observations.

ADDITIONAL INFORMATION

None