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July 16, 2015

Docket Nos.: 50-348

NL-15-1288

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001


Joseph M. Farley Nuclear Plant – Unit 1
Licensee Event Report 2015-003-00
Failure to Meet a Technical Specification Completion Time for Reportability

Ladies and Gentlemen:

This Licensee Event Report is being submitted pursuant to the requirements of the Code of Federal Regulations, 10 CFR 50.73(a)(2)(i)(B), for a condition prohibited by Technical Specifications. The required action statement for having one Reactor Trip System Instrumentation Channel inoperable was not met.

This letter contains no NRC commitments. If you have any questions regarding the submittal, please contact Ms. Julie Collier at (334) 814-4639.

Sincerely,


Ms. C. A. Gayheart
Vice President – Farley

CAG/JAC

Enclosure: Unit 1 Licensee Event Report 2015-003-00

cc: Southern Nuclear Operating Company
Mr. S. E. Kuczynski, Chairman, President & CEO
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Mr. M. D. Meier, Vice President – Regulatory Affairs
Mr. D. R. Madison, Vice President – Fleet Operations
Mr. B. J. Adams, Vice President – Engineering
Ms. B. L. Taylor, Regulatory Affairs Manager – Farley
Mr. J. E. Purcell, Operating Experience Coordinator - Farley
RTYPE: CFA04.054

U. S. Nuclear Regulatory Commission
Mr. V. M. McCree, Regional Administrator
Mr. S. A. Williams, NRR Project Manager - Farley
Mr. P. K. Niebaum, Senior Resident Inspector - Farley

Joseph M. Farley Nuclear Plant – Unit 1

Enclosure

Unit 1 Licensee Event Report 2015-003-00

Failure to Meet a Technical Specification Completion Time for Reportability



LICENSEE EVENT REPORT (LER)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollections.Resource@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

Joseph M. Farley Nuclear Plant, Unit 1

2. DOCKET NUMBER

05000 348

3. PAGE

Page 1 of 3

4. TITLE

Failure to Meet a Technical Specification Completion Time for Reportability

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
05	17	2015	2015 - 003 - 00			7	16	2015	FACILITY NAME	DOCKET NUMBER
9. OPERATING MODE 1			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)				
10. POWER LEVEL 100 %			<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

Julie A. Collier - Licensing Engineer

TELEPHONE NUMBER (Include Area Code)

(334) 814-4639

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
N/A	N/A	N/A	N/A	N/A					

14. SUPPLEMENTAL REPORT EXPECTED

☐ YES (If yes, complete 15. EXPECTED SUBMISSION DATE) ☒ NO

15. EXPECTED SUBMISSION DATE

MONTH DAY YEAR

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

At 1423 CDT 5/14/15 with Unit 1 in Mode 1 at 100 percent power, plant data was collected that was later used to identify that scaling data was incorrect for the Reactor Coolant System B Train Delta T instrumentation. Analysis indicated this channel was outside of its allowable Technical Specification (TS) tolerance making it inoperable, and the plant entered TS 3.3.1 Limiting Condition for Operation (LCO) Condition E at 1115 5/16/15. The action statement for having one channel out of service was completed at 1610 5/17/15 by placing the channel in trip. The channel was subsequently rescaled and returned to operable status 5/18/15 at 1533. However, compliance with an LCO does not eliminate the need to submit a Licensee Event Report if there is firm evidence that a condition prohibited by TS existed before discovery for a time longer than permitted by the LCO. Consequently, for reportability requirements the completion time was exceeded since the period of time between data collection (1423 5/14/15) and the channel being placed in trip (1610 5/16/15) was over 72 hours. This is a reportable condition under 10 CFR 50.73(a)(2)(i)(B). The cause was a failure to recognize the appropriate starting time for the 72 hour reporting requirement related to scaling activities. Corrective actions will address knowledge gaps for appropriate Operations, Engineering and Licensing personnel.

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

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1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Joseph M. Farley Nuclear Plant, Unit 1	05000 348	YEAR	SEQUENTIAL NUMBER	REV NO.	2 of 3
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NARRATIVE**PLANT AND SYSTEM IDENTIFICATION**

Westinghouse - Pressurized Water Reactor

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

DESCRIPTION OF EVENT

At 1423 CDT on 5/14/15 with Unit 1 operating in Mode 1 at 100 percent power, plant data collection was completed for a surveillance test for the Reactor Coolant System (RCS) Flow Measurement (FNP-1-STP-115.1). The data was provided to Engineers to evaluate the scaling of RCS protection channels at 1757 on 5/14/15. The analysis noted a discrepancy between the collected data and data from the Integrated Plant Computer for the B Train Delta T instrumentation channel Q1B13TS0422B2, indicating that this channel was outside its Technical Specification (TS) accuracy requirements and that its operability was in question. On 5/16/15 a repeat of the RCS flow measurement procedure was completed to validate the data discrepancy. The channel was declared inoperable and TS 3.3.1 Condition E was entered at 1115 on 5/16/15.

A discussion was held between Engineering, Operations and Licensing concerning placing the B Train Delta T instrumentation channel in the trip position by 1757 on 5/17/15 to meet the 72 hour required action completion time. This was based on the time at which Engineering received the data and commenced scaling evaluations.

On 5/17/15 at 1610 the channel was placed in the tripped condition. The channel was rescaled and returned to operable status on 5/18/15 at 1533 CDT. The LCO was exited at 1533 on 5/18/15.

CAUSE OF EVENT

The cause was a failure to recognize that the required action needed to be completed based on the time that firm evidence for declaring inoperability existed. The discussion held between Engineering, Operations and Licensing concluded in error that the B Train Delta T instrumentation channel should be placed in the trip position by 1757 on 5/17/15 to meet the 72 hour required action completion time. The required action should have been based on the time of the data collection which had occurred at 1423 on 5/14/15, and which was the point when firm evidence existed to support the instrument's inoperable condition. This would have resulted in a time of no later than 1423 on 5/17/15 for the channel to be placed in trip. Instead the initiation time was based on the time at which Engineering received the data and commenced scaling evaluations.

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

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NARRATIVE**REPORTABILITY ANALYSIS AND SAFETY ASSESSMENT**

A condition prohibited by TS existed before discovery for a time longer than permitted by the LCO. Consequently, for reportability requirements the 72 hour completion time was exceeded. This is reportable by the requirements of the Code of Federal Regulations, 10 CFR 50.73(a)(2)(i)(B), for a condition prohibited by Technical Specifications.

During the time that the B Train Delta T instrumentation channel Q1B13TS0422B2 was in an out-of-tolerance condition, the redundant protection channels remained capable of performing their safety functions. Therefore, because the channels are combined in a 2-out-of-3 trip logic, sufficient inputs to the Overtemperature and Overpower Delta T trip functions were available to ensure that DNB design basis was met and that protection was available for Condition I and II transients to ensure the integrity of the fuel.

CORRECTIVE ACTION

Corrective actions will address knowledge gaps for appropriate Operations, Engineering and Licensing personnel.

ADDITIONAL INFORMATION

Other system affected: No systems other than those mentioned in this report were affected by this event.

Commitment Information: This report does not create any licensing commitments

Previous Similar Events: Farley Unit 1 LER 2013-003-01 was a similar event that occurred when a Steam Generator Steam Flow Transmitter channel was out of service for a period longer than allowed by TS. In that event the cause was excessive duration of the process for channel normalization that extended past the TS required action times. Two similar previous events on Unit 2 have occurred. Both were reported in Farley Unit 2 LER 2013-001-00, in which the 2C Steam Generator Flow Transmitter FT-494 was inoperable longer than allowed by Technical Specifications.