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 FACIL:50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244  
 AUTH.NAME AUTHOR AFFILIATION  
 ST MARTIN,J.T. Rochester Gas & Electric Corp.  
 MECREDY,R.C. Rochester Gas & Electric Corp.  
 RECIP.NAME RECIPIENT AFFILIATION

JOHNSON,A.R. Project Directorate I-3

SUBJECT: LER 93-005-00:on 931011,due to misinterpretation of TS  
 4.6.1.e.3.(a) requirements,verification of load shedding  
 capability of safeguards loads not adequately performed.  
 Testing completed to verify capability.W/931110 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 10  
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NOTES:License Exp date in accordance with 10CFR2,2.109(9/19/72). 05000244

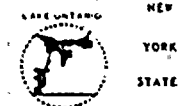
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ROBERT C. MECREDY  
Vice President  
Ginna Nuclear Production

TELEPHONE  
AREA CODE 716 546-2700

November 10, 1993

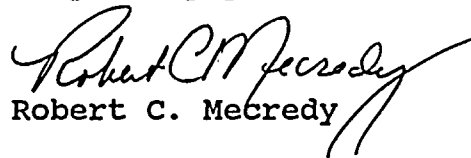
U.S. Nuclear Regulatory Commission  
Attn: Allen R. Johnson  
Project Directorate I-3  
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Washington, DC 20555

Subject: LER 93-005, Failure to Perform Surveillance, Due to  
Misinterpretation of Requirements, Causes a Condition  
Prohibited by Plant Technical Specifications  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

In accordance with 10 CFR 50.73, Licensee Event Report System,  
item (a) (2) (i) (B), which requires a report of, "any operation or  
condition prohibited by the plant's Technical Specifications", the  
attached Licensee Event Report LER 93-005 is hereby submitted.

This event has in no way affected the public's health and  
safety.

Very truly yours,

  
Robert C. Mecredy

xc: U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Ginna USNRC Senior Resident Inspector

9311170036 931110  
PDR ADDCK 05000244  
S PDR





## LICENSEE EVENT REPORT (LER)

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

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH  
THIS INFORMATION COLLECTION REQUEST: 50.0 HRS.  
FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO  
THE INFORMATION AND RECORDS MANAGEMENT BRANCH  
(MNB 7714), 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) R.E. Ginna Nuclear Power Plant

DOCKET NUMBER (2)  
05000244PAGE (3)  
1 OF 9TITLE (4) Failure to Perform Surveillance, Due to Misinterpretation of Requirements, Causes a Condition Prohibited by Plant  
Technical Specifications

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
10	11	93	93	--005--	00	11	10	93	FACILITY NAME	DOCKET NUMBER 05000
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		097	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	
			20.405(a)(1)(iii)		X 50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 366A)	
			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 John T. St. Martin - Director, Operating Experience

TELEPHONE NUMBER (Include Area Code)  
(315) 524-4446

## 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)

YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
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## ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On October 11, 1993, at 1330 EDST, with the reactor at approximately 97% full power, evaluation of surveillance testing procedures determined that Technical Specification 4.6.1.e.3.(a) requirements were misinterpreted. Therefore, it was concluded that verification of load shedding capability of safeguards loads had not been adequately performed.

Immediate corrective action was initiated to complete testing that would verify this load shedding capability. This testing was completed within 24 hours of discovery, achieving compliance with Technical Specification 4.6.1.e.3.(a) requirements.

The underlying cause of the failure to perform this surveillance was a misinterpretation of Technical Specification surveillance requirements. (This event is NUREG-1220 (E) cause code.)

Corrective action was to perform the testing. Corrective action to preclude repetition is outlined in Section V (B).



LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), 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)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

## I. PRE-EVENT PLANT CONDITIONS

The plant was at approximately 97% steady state reactor power. An evaluation of surveillance test procedures was in progress, to address potential non-compliance with Technical Specification 4.6.1.e.3.(a) surveillance requirements to verify load shedding from the emergency buses.

## II. DESCRIPTION OF EVENT

## A. DATES AND APPROXIMATE TIMES OF MAJOR OCCURRENCES:

1. October 11, 1993, 1330 EDST: Event date and approximate time.
2. October 11, 1993, 1330 EDST: Discovery date and approximate time.
3. October 11, 1993, 2037 EDST: Initiated testing to verify load shedding capability for loads on emergency bus 14.
4. October 12, 1993, 0441 EDST: Initiated testing to verify load shedding capability for loads on emergency bus 18.
5. October 12, 1993, 0447 EDST: Completed testing of load shedding for safeguards loads from emergency bus 14.
6. October 12, 1993, 0539 EDST: Completed testing of load shedding for safeguards loads from emergency bus 18. Load shedding was satisfactorily verified for the "A" train of safeguards equipment.
7. October 12, 1993, 0540 EDST: Initiated testing to verify load shedding capability for loads on emergency bus 17.
8. October 12, 1993, 0625 EDST: Completed testing to verify load shedding for safeguards loads from emergency bus 17.
9. October 12, 1993, 0626 EDST: Initiated testing to verify load shedding capability for loads on emergency bus 16.





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

10. October 12, 1993, 0716 EDST: "B" component cooling water (CCW) pump operability was indeterminate. The pump was declared inoperable and removed from service.
11. October 12, 1993, 0950 EDST: Completed testing of load shedding for safeguards loads from emergency bus 16. Load shedding was satisfactorily verified for the "B" train of safeguards equipment, except for the "B" CCW pump.
12. October 12, 1993, 1003 EDST: With the completion of testing for the "A" and "B" trains of safeguards equipment, compliance with Technical Specification 4.6.1.e.3.(a) was achieved.
13. October 12, 1993, 1939 EDST: "B" CCW pump declared operable.

## B. EVENT:

On October 11, 1993, at approximately 1330 EDST, station and engineering staff confirmed that surveillance test procedures had not fully complied with the requirements of Technical Specification (TS) 4.6.1.e.3.(a), in that verification of load shedding of safeguards loads powered from the emergency buses (buses 14, 16, 17, and 18), while simulating a loss of offsite power in conjunction with a safety injection (SI) test signal, had not been performed as required. The guidance of NRC Generic Letter (GL) 87-09, entitled "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements", was followed. Both the "A" and "B" diesel generators (D/Gs) were available to perform all intended functions. Failure to perform the surveillance within the specified time interval constituted a non-compliance with the Operability Requirements of the Limiting Conditions for Operation (LCO).



LICENSEE EVENT REPORT (LER)  
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Surveillance testing to verify compliance with TS 4.6.1.e.3.(a) was initiated on October 11, 1993, at approximately 2037 EDST, with each emergency bus being tested sequentially. Testing for the "A" train of safeguards equipment (emergency buses 14 and 18) was completed at approximately 0539 EDST (on October 12, 1993), and testing for the "B" train (emergency buses 16 and 17) was completed at approximately 0950 EDST. Technical Specification compliance was achieved at approximately 1003 EDST.

During testing of the "B" train, resistance reading of a relay contact associated with the "B" CCW pump breaker Undervoltage Trip circuitry did not meet the specified acceptance criteria. Despite having confidence that the higher resistance did not impede the "B" CCW pump load shedding feature, the station staff elected to declare the "B" CCW pump inoperable. The "B" CCW pump was removed from service, and the appropriate TS LCO was entered, until functional testing and/or corrective maintenance could verify acceptable circuit operation. Subsequently, the "B" CCW pump breaker was racked into the test position, closed from the Main Control Board, and successfully trip tested by actuating the undervoltage circuitry. This test demonstrated acceptable load shedding capability. Following this verification of circuit operability, corrective maintenance was performed to improve circuit performance.

The corrective maintenance consisted of burnishing of an auxiliary relay contact in the pump trip circuitry. The corrective maintenance proved successful, with subsequent resistance readings meeting the acceptance criteria. The "B" CCW pump was restored to service and declared operable. Note that the functional trip test, which was successfully performed prior to the corrective maintenance, demonstrated acceptable load shedding capability for the "B" CCW pump.



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## C. INOPERABLE STRUCTURES, COMPONENTS, OR SYSTEMS THAT CONTRIBUTED TO THE EVENT:

None.

## D. OTHER SYSTEMS OR SECONDARY FUNCTIONS AFFECTED:

None.

## E. METHOD OF DISCOVERY:

This event was apparent after completion of an evaluation of TS 4.6.1.e.3.(a) and surveillance test procedures (procedures RSSP-2.1, RSSP-2.1A, RSSP-2.2, RSSP-19, RSSP-20, PT-9.1.14, PT-9.1.16, PT-9.1.17, and PT-9.1.18). This evaluation determined that verification of load shedding capability of safeguards loads from the emergency buses had not been adequately performed.

## F. OPERATOR ACTION:

The Control Room operators were notified of the failure to fully comply with the requirements of TS, and that the guidance of NRC GL 87-09 provided a 24 hour period to complete the required surveillance testing.

## G. SAFETY SYSTEM RESPONSE:

None.



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

## III. CAUSE OF EVENT

## A. IMMEDIATE CAUSE:

The immediate cause for failure to fully comply with requirements of TS was procedural deficiency, in that surveillance test procedures did not completely reflect the requirements of TS 4.6.1.e.3.(a).

## B. ROOT CAUSE:

The underlying cause of the procedural deficiencies was a misinterpretation of TS surveillance requirements. TS 4.6.1.e.3.(a) had been previously interpreted that the load shedding capabilities required to be verified were for the non-essential loads powered from the emergency buses. This capability (for non-essential loads) has been tested by simulating a SI signal during performance of procedures RSSP-2.1 and RSSP-2.1A, which are performed each refueling outage. The need to verify load shedding capabilities for safeguards loads, with both undervoltage and SI present, had not been considered in this interpretation. (This event is NUREG-1220 (E) cause code, Management/Quality Assurance Deficiency).

## IV. ANALYSIS OF EVENT:

This event is reportable in accordance with 10 CFR 50.73, Licensee Event Report System, item (a) (2) (i) (B), which requires a report of, "Any operation or condition prohibited by the plant's Technical Specifications". Failure to perform the surveillance to verify load shedding from the emergency buses for greater than 18 months is a condition prohibited by Ginna Technical Specifications.





LICENSEE EVENT REPORT (LER)  
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As stated in NRC GL 87-09, "Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute non-compliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours."

An assessment was performed considering both the safety consequences and implications of this event with the following results and conclusions:

The requirement of TS 4.6.1.e.3.(a) is to simulate a loss of offsite power in conjunction with a safety injection test signal and verify de-energization of the emergency buses and load shedding from the emergency buses.

Performance of this surveillance is accomplished through a number of shutdown procedures: RSSP-2.1, RSSP-2.1A, RSSP-2.2, RSSP-19, RSSP-20, PT-9.1.14, PT-9.1.16, PT-9.1.17, and PT-9.1.18. An evaluation of these procedures indicated that the undervoltage load shedding of the following safeguards equipment was not being performed: safety injection (SI) pumps, residual heat removal (RHR) pumps, service water (SW) pumps, containment recirculation fans, and auxiliary feedwater (AFW) pumps. In addition, the undervoltage (in conjunction with SI signal) load shedding of the CCW pumps was not being performed. The procedures did verify the operability of the undervoltage relays, undervoltage system logic, and partially verified the operability of the undervoltage auxiliary relays. The procedures also verified the load shedding of all other emergency bus loads.



LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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The testing performed on October 11 and 12, 1993 demonstrated end-to-end operability of the undervoltage protection system. This testing verified undervoltage signals to all safeguards equipment, and undervoltage in conjunction with SI signals to the CCW pumps. This testing also verified full operability of the undervoltage auxiliary relays.

The testing, in combination with the surveillance tests conducted during the 1993 outage, met the requirements of TS 4.6.1.e.3.(a). Based on the above, it can be concluded that the public's health and safety was assured at all times.

## V. CORRECTIVE ACTION

## A. ACTION TAKEN TO RETURN AFFECTED SYSTEMS TO PRE-EVENT NORMAL STATUS:

- Testing was performed within 24 hours of discovery, and compliance with the requirements of TS 4.6.1.e.3.(a) was achieved.

## B. ACTION TAKEN OR PLANNED TO PREVENT RECURRENCE:

- Procedures that verify load shedding capability will be upgraded to include safeguards loads, for conditions of undervoltage and SI, prior to the next scheduled refueling outage.
- The requirements of TS 4.6.1 have been reviewed and compared with surveillance procedures. No non-compliances were identified.
- A review of Section 4 of the Ginna Technical Specifications will be performed, to ensure that there are implementing procedures for every surveillance required by TS.



LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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

## VI. ADDITIONAL INFORMATION

## A. FAILED COMPONENTS:

None.

## B. PREVIOUS LERs ON SIMILAR EVENTS:

A similar LER event historical search was conducted with the following results: No documentation of similar LER events with the same root cause at Ginna Nuclear Power Plant could be identified.

## C. SPECIAL COMMENTS:

NRC GL 87-09 allows 24 hours to perform a missed surveillance test, if the allowable outage time (AOT) of the LCO Action Requirements are less than this 24 hour time limit, or when shutdown Action Requirements apply. This time limit is based on balancing the risks between completing the required testing and potentially challenging safety systems while performing shutdown actions. TS 4.6.1.e.3.(a) is normally required to be performed during shutdown conditions, since performing this surveillance removes the normal source of offsite power, which may cause electrical system disturbances. Rochester Gas & Electric (RG&E) elected to perform the necessary testing at power, after evaluating the potential risks.

A review of existing testing procedures indicated that only specific portions of the load shedding capabilities were not being tested. RG&E determined that performance of the necessary voltage and continuity tests to verify these untested capabilities could be safely conducted at power. This is due to the fact that no safeguards loads on the buses would have to be declared inoperable, and no offsite power source would have to be removed from service to perform the tests. Therefore, performance of the necessary tests (at power) within 24 hours of discovery was deemed appropriate.

