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ACCESSION NBR: 9403010270 DOC. DATE: 94/02/17 NOTARIZED: NO DOCKET #
 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
 AUTH. NAME AUTHOR AFFILIATION
 ST JOHN, J.T. Rochester Gas & Electric Corp.
 MECREDY, R.C. Rochester Gas & Electric Corp.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 94-001-00: on 940119, Radition Monitor R-32 declared inoperable due to low output by one decade. Correct value of calibr constant for R-32 determined & edited into R-32 control terminal. W/940217 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 10
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES: License Exp date in accordance with 10CFR2, 2.109 (9/19/72). 05000244

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February 17, 1994

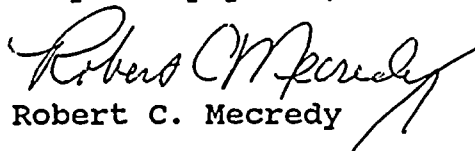
U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: LER 94-001, Radiation Monitor R-32 ("B" Main Steam Line)
Inoperable, Due to Personnel Error, 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 94-001 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 Senior Resident Inspector

290008

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PDR ADDCK 05000244
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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 (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) R.E. Ginna Nuclear Power Plant

DOCKET NUMBER (2)

05000244

PAGE (3)

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TITLE (4) Radiation Monitor R-32 ("B" Main Steam Line) Inoperable, Due to Personnel Error, 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
01	19	94	94	--001--	00	02	17	94	FACILITY NAME	DOCKET NUMBER
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)	X 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

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On January 19, 1994, at approximately 1330 EST, with the reactor at approximately 97% steady state power, the output of the "B" Main Steam Line Radiation Monitor R-32 was discovered to be low by one decade. R-32 was declared inoperable.

Investigation revealed that a calibration constant was incorrectly documented due to a transposition error, and the incorrect value was edited into the R-32 control terminal. Immediate corrective action was to edit the correct value of the calibration constant into R-32. This restored the output of R-32 to the correct range, and R-32 was declared operable. (This event is NUREG-1022 (A) cause code.)

Corrective action to preclude repetition is outlined in Section V (B).

This LER meets the requirements of a Special Report required by the Ginna Technical Specifications.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

I. PRE-EVENT PLANT CONDITIONS

The reactor was at approximately 97% steady state reactor power. An engineer was reviewing a printout from the control terminal for the "B" Main Steam Line Radiation Monitor (R-32). This review was being done as part of research for a planned modification. The scope of the modification is to replace the standby recorder for main steam line radiation levels (recorder RK-47A) with continuous indication of these radiation levels in the Control Room.

II. DESCRIPTION OF EVENT

A. DATES AND APPROXIMATE TIMES OF MAJOR OCCURRENCES:

- o October 7, 1993: R-32 calibrated per CPI-MON-R31/R32. The value of the calibration constant is incorrectly transposed and edited into the R-32 control terminal. (Event date)
- o October 7, 1993: Procedure PT-17.5 changed to reflect the tolerance band of output readings for R-32, based on the calibration constant edited into the R-32 terminal. PT-17.5 performed to verify operability of R-32.
- o January 19, 1994, 1330 EST: Discovery date and time.
- o January 19, 1994, 1547 EST: The correct value of the calibration constant for R-32 is determined and edited into the R-32 control terminal, per CPI-MON-R31/R32. R-32 restored to operable status.

LICENSEE EVENT REPORT (LER)
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B. EVENT

The annual calibration of the "B" Main Steam Line Radiation Monitor (R-32) was completed on October 7, 1993, in accordance with calibration procedure CPI-MON-R31/R32, "Calibration of DAM-3 Steam Line Radiation Monitors R31 and R32". As part of the calibration, the Instrument and Control (I&C) technician calculates a calibration constant, based on actual detector sensitivity and source strength. After completion of the calibration, the technician then edits the new value into the control terminal (SPING CT-1) for R-32 (unit 04, channel 02 of the SPING CT-1). (The SPING CT-1 controls various radiation monitor channels throughout the plant.) The calibration constant is an "editable parameter", and is used to convert counts per minute (CPM) from the detector into readings of millirem per hour (mr/hr). When the reading reaches 0.1 mr/hr, recorder RK-47A in the Control Room is activated, and begins recording.

When the calibration constant was calculated (on October 7, 1993), the I&C technician misplaced the decimal point while transposing the calculated value from decimal notation to scientific notation. Consequently, an incorrect power of ten (one decade too low) was recorded on the procedure data sheet and edited into the R-32 control terminal. (The decimal reading was correctly calculated as "0.0197", but was incorrectly transposed and documented as 1.97 E-03 instead of 1.97 E-02.) The parameter was then edited into the R-32 control terminal as 1.97 E-03.

Surveillance procedure PT-17.5, "High Range Effluent Monitors R-12A, R-14A, R-15A, R-31, R-32", was then changed by the I&C technician, on October 7, 1993, to reflect the tolerance band of output readings for R-32, based on the new value of the calibration constant. PT-17.5 was performed, and the Plant Process Computer System (PPCS) was checked to confirm that the output of R-32 was within the PPCS "quality code" and "current value" tolerances. R-32 was then declared operable by the Control Room operators.

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PT-17.5 was performed each month thereafter to verify the operability of R-32. Daily channel checks were performed by Control Room operators to confirm the PPCS values were still within tolerances.

On January 19, 1994, at approximately 1330 EST, with the reactor at approximately 97% steady state reactor power, an engineer was reviewing a printout from the CT-1 control terminal. This review was being done as part of research for a planned modification. The scope of the modification is to replace standby recorder RK-47A with continuous indication of main steam line radiation levels in the Control Room. The engineer calculated the calibration constants, and, based on his knowledge of the system, observed that the constant being used in R-32 was not within allowable system parameters. Further investigation revealed that this inconsistent value was caused by the transposition error discussed above.

The engineer notified the I&C group of his discovery. I&C concurred with the engineer. They notified the Control Room operators that R-32 had an incorrect calibration constant and that the output was one decade too low.

The Control Room operators evaluated this information, and formally declared R-32 inoperable at approximately 1430 EST on January 19, 1993. The correct value of the calibration constant was edited into the R-32 control terminal, per CPI-MON-R31/R32. PT-17.5 was changed to reflect the data for the corrected value of the calibration constant and was performed to verify the operability of R-32. The Control Room operators checked the PPCS, and confirmed that the output was within the PPCS tolerances. R-32 was declared operable, and returned to service at approximately 1547 EST, January 19, 1994.

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

None

D. OTHER SYSTEMS OR SECONDARY FUNCTIONS AFFECTED:

None

NRC FORM 366A (5-92)		U.S. NUCLEAR REGULATORY COMMISSION <div style="text-align: right;">APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95</div>		
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.		
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E. METHOD OF DISCOVERY:

This event was identified by an engineer, who reviewed a printout from the CT-1 control terminal as part of research for a planned modification to replace standby recorder RK-47A with continuous indication in the Control Room. The engineer observed that the calibration constant being used was not within allowable system parameters.

F. OPERATOR ACTION:

The Control Room operators were notified of this event, and declared R-32 inoperable. Subsequently, the Control Room operators notified higher supervision and the NRC. R-32 was declared operable after the correct calibration constant was edited into the R-32 control terminal, PT-17.5 was satisfactorily completed, and PPCS channel checks of R-32 were performed.

G. SAFETY SYSTEM RESPONSE:

None

III. CAUSE OF EVENT

A. IMMEDIATE CAUSE:

The immediate cause of R-32 being considered to be inoperable was that the output of R-32 was discovered to be low by one decade, such that R-32 would have activated the RK-47A recorder at approximately 1 mr/hr instead of the design value of 0.1 mr/hr.

B. INTERMEDIATE CAUSE:

The intermediate cause of the low output of R-32 was that the value of the calibration constant was transposed incorrectly when changing the value from decimal notation to scientific notation.

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C. ROOT CAUSE:

The underlying cause of the transposition error was a personnel error by an I&C technician. This was a cognitive personnel error and was not contrary to the calibration procedure being used. There were no unusual characteristics of the work location which contributed to the error. (This event is NUREG-1022 (A) cause code, Personnel Error.)

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". The output of R-32 being one decade too low resulted in R-32 being considered inoperable. Since this condition existed since October 7, 1993, and was not discovered until January 19, 1994, R-32 was inoperable for more than seven days. This is a condition prohibited by the Ginna Technical Specifications (TS).

o Specification 3.5.4 states:

The radiation accident monitoring instrumentation channels shown in Table 3.5-6 shall be operable, whenever the reactor is at or above hot shutdown. With one or more radiation monitoring channels inoperable, take the action shown in Table 3.5-6. Startup may commence or continue consistent with the action statement.

o Action statements from Table 3.5-6 states:

With the number of operable channels less than required by the Minimum Channels Operable requirements, either restore the inoperable channel(s) to operable status within 7 days of the event, or prepare and submit a Special Report to the Commission within 30 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to operable status.

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The "B" Main Steam Line Radiation Monitor (R-32) inoperability was not discovered until January 19, 1994. Therefore, the condition was not recognized at the time a Special Report would have been required. Consequently, a Special Report was not submitted within 30 days following the event on October 7, 1993.

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

There were no operational or safety consequences or implications attributed to R-32 being inoperable for greater than seven days, because R-32 was still functioning and capable of responding to radiation levels at 10% of the TS limits, instead of the desired 1% of TS limits. Because the setpoint is very conservative to begin with, the one decade error in the calibration constant still allowed the system to respond well within the TS limits.

The design for R-32 is that when the output reaches 0.1 mr/hr, recorder RK-47A activates to provide indication and recording of R-32 in the Control Room. R-32 was functioning correctly, but due to this transposition error, the output was in error low by one decade. (The detector for R-32 continued to function as designed, and continued to detect and monitor radioactivity. The detector output, as measured in CPM was still correct. However, the output reading, as expressed in mr/hr, was one decade too low.) Therefore, the RK-47A recorder in the Control Room would not have activated until the actual radiation reached 1 mr/hr (one decade higher than desired). This corresponds to a release concentration of approximately 1 E-02 microcuries per cubic centimeter (uCi/cc) noble gases or a release rate of approximately 1.33 E-02 curies per second (Ci/sec). Note that the "instantaneous" TS limit for a release rate from the location would be similar to the Air Ejector or 1.42 E-01 Ci/sec. The error before the recorder started would represent 10% of the TS limit, rather than 1% when the correct calibration constant is used.

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The release path that R-32 monitors is main steam relief valve discharge. R-32 readings are used to determine the potential dose to the general population through releases from the steam generators, when the relief valves have lifted after a primary to secondary steam generator leak. There were no releases through this release path during the time that R-32 was considered inoperable. If relief valves had lifted during this time, the duration of the release and the amount of activity released would have been determined from data from several sources, including R-32. R-32 data would have been discovered to be inconsistent with other data at such a time, and would not affect the accuracy of release calculations.

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:

- o The correct value of the calibration constant for R-32 was determined and edited into the R-32 control terminal, per CPI-MON-R31/R32.
- o PT-17.5 was changed to reflect the correct value of the calibration constant and was performed to verify operability of R-32.
- o A PPCS channel check was performed to verify operability of R-32.
- o The other radiation channels controlled by the SPING CT-1 control terminal were verified to have the correct calibration constants edited into the control terminal.

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B. ACTION TAKEN OR PLANNED TO PREVENT RECURRENCE:

- o Procedure CPI-MON-R31/R32 has been revised to provide a tolerance band for acceptable values of the calibration constant. This tolerance will be expressed in both decimal and scientific notation.
- o Calibration procedures for other channels controlled by CT-1 have been reviewed. Procedures will be revised to provide the appropriate tolerance bands for editable parameters.
- o The importance of making calculations correctly will be reemphasized to all I&C personnel, including the consequences of incorrect results.

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:

None

