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 WASHINGTON, S.L. Washington Public Power Supply System
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 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 88-035-00: on 881101, missed surveillance of control rod
 block due to inadequate plant procedure. W/881201 ltr.
W/8 ltr.

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Washington Nuclear Plant - Unit 2										DOCKET NUMBER (2) 0 5 0 0 0 3 9 7 1										PAGE (3) 1 OF 05					
TITLE (4) Missed Required Technical Specification Control Rod Block Intermediate Range Quarterly Channel Calibration Surveillances Due to Inadequate Plant Procedures																									
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 NAMES							DOCKET NUMBER(S)									
1	1	0	1	8	8	8	8	0	3	5	0	0	1	2	0	1	8	8	0 5 0 0 0						
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																						
POWER LEVEL (10)			20.402(b)					20.405(c)					50.73(a)(2)(iv)					73.71(b)							
0 8 3			20.405(a)(1)(i)					50.38(c)(1)					50.73(a)(2)(v)					73.71(c)							
			20.405(a)(1)(ii)					50.38(c)(2)					50.73(a)(2)(vi)					OTHER (Specify in Abstract below and in Text, NRC Form 365A)							
			20.405(a)(1)(iii)					X 50.73(a)(2)(i)					50.73(a)(2)(viii)(A)												
			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)(ix)												

NAME S.L. Washington, Compliance Engineer										TELEPHONE NUMBER 5 1 0 9 3 1 7 7 1 - 1 2 1 0 8 1 0											
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																					
CAUSE	SYSTEM	COMPONENT	MANUFAC- Turer	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFAC- Turer	REPORTABLE TO NPRDS											
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 fifteen single-space typewritten lines) (16)

On November 1, 1988 it was determined that seven Control Rod Block Intermediate Range Monitor (IRM) Quarterly Channel Calibration (CC) Surveillances had not been completed as required by the WNP-2 Plant Technical Specifications. The eighth IRM Channel, "Channel A", had previously been declared inoperable. The failure to complete the surveillances was discovered by a Plant Instrument and Control (I&C) Generation Aide while updating the Plant I&C Department internal nuclear instrument surveillance status list following a Plant outage.

On October 27, 1988 the Plant was shutdown to repair steamleaks in the Main Steam System. While preparing the I&C list of required startup surveillances the Plant I&C Engineer inadvertently omitted the Control Rod Block IRM Quarterly CC Surveillances. The Control Rod Block IRM Quarterly CC Surveillances had been previously deferred on October 1, 1988, because they cannot be completed while the Plant is in Operational Mode 1 (Power Operation). On October 29, 1988 when the Plant Operational Mode was changed from Mode 4 (Cold Shutdown) to Mode 2 (Startup), the Plant was in violation of WNP-2 Plant Technical Specification 4.0.4 because the surveillances had not been performed within the applicable surveillance interval. However, there was no direct effect on the Plant Startup.

The causes of this event are the lack of an independent review of surveillance testing required for changes in operational conditions, and an inadvertent personnel error. Startup Checklist Procedures will be revised to include an independent review of deferred surveillances by each Plant Department prior to Operational Condition changes. A note was added to the Operations Department "Night Orders" stating that the Control Rod Block IRM CC Surveillances must be completed prior to entering Operational Modes 2 or 5.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

Abstract (cont'd)

There is no safety significance associated with this event because the Control Rod Block IRM CFT Surveillances performed during the October 27-29, 1988 outage verified the operability of the IRM control rod block functions prior to entering Operational Mode 2.

Plant Conditions

- a) Power Level - 83%
- b) Plant Mode - 1 (Power Operation)

Event Description

On November 1, 1988 it was determined that seven Control Rod Block Intermediate Range Monitor (IRM) Quarterly Channel Calibration (CC) Surveillances had not been completed as required by the WNP-2 Plant Technical Specifications. The eighth IRM Channel, "Channel A", had previously been declared inoperable. The failure to complete the surveillances was discovered on November 1, 1988 by a Plant Instrument and Control (I&C) Generation Aide while updating the Plant I&C Department internal nuclear instrumentation surveillance status list following a Plant outage.

The following is a summary of events leading to the missed surveillances. All eight Control Rod Block IRM Quarterly CC Surveillances were performed on June 11, 1988. On June 22, 1988 IRM Channel A was declared inoperable. The next performance of the surveillances was scheduled for September 4, 1988 by the Plant Scheduled Maintenance System (SMS) a computer tracking program. One week prior to the scheduled surveillance date SMS computer tracking cards were issued to the Plant I&C Department. The Plant was shutdown from August 24 to September 5, 1988; however, the Control Rod Block IRM Quarterly CC Surveillances were not required to be performed at that time. On the late date for completing the surveillances, October 1, 1988, the surveillances were deferred because they could not be completed while the Plant was in Operational Mode 1 (Power Operation). In accordance with Plant Procedure PPM 1.5.1, "Technical Specification Surveillance Testing Program," notations were added to the SMS computer tracking cards stating that the surveillance could not be completed and that they must be completed prior to entering Plant Operational Modes 2 (Startup) or 5 (Refueling). The Plant Maintenance Programs Group places deferred SMS computer tracking cards in a file which is available for review by Plant Departments to determine testing required for changes in operational conditions. In addition, the Plant I&C Department added the Control Rod Block IRM Quarterly Channel Calibrations to their internal nuclear instrumentation surveillance status list. Both of these actions are consistent with the corrective actions described in LER 86-032.

On October 27, 1988 the Plant was shutdown to repair steamleaks in the Main Steam System. A Plant I&C Engineer (after working a normal day shift) was called back to the Plant to prepare the I&C Department list of surveillance procedures required to be completed prior to Plant startup.

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While attempting to complete this list the engineer was interrupted to help with other I&C outage work. The Plant I&C Engineer completed the list, but inadvertently omitted the Control Rod Block IRM Quarterly CC Surveillances. The I&C Supervisor normally reviews the startup surveillance list; however, he was absent from the site and the delegated Supervisor was not aware of the need to review the list and, as a result, did not review it. At 1038 hours on October 29, 1988 the Reactor Mode Switch was moved from the Cold Shutdown (Mode 4) to Startup (Mode 2) position which was in violation of the WNP-2 Plant Technical Specification 4.0.4 because the Control Rod Block IRM Quarterly Channel Calibration Surveillances had not been performed within the applicable surveillance interval. When the failure to perform the Channel Surveillances was discovered the Plant was in Operational Mode 1 (Run). Since the IRM Control Rod Block functions are only required in Plant Operational Modes 2 and 5, the Plant is currently in compliance with the Technical Specifications.

Immediate Corrective Action

Since the Plant was in Operational Mode 1 when the error was discovered, there are no appropriate immediate corrective actions for this event.

Further Evaluation and Corrective Action

A. Further Evaluation

This event is being reported under the provisions of 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the WNP-2 Plant Technical Specifications.

IRM Channel A was declared inoperable on June 22, 1988 because of a suspected detector failure. There were no other Plant structures, systems or components inoperable at the start of this event that contributed to the event.

The causes of this event are the lack of an independent review of surveillance testing required for Operational Condition changes, and the inadvertent error by the Plant I&C Engineer in preparing the I&C startup surveillance list. Plant procedures did contribute to the cause of this event in that an independent review was not a procedural requirement.

B. Further Corrective Action

1. The Master Startup Checklist and the Minimum Startup Checklist Procedures will be revised to include an independent review of deferred surveillances by each Plant Department and verification of completion of all required surveillances prior to a change in Operational Condition.
2. A note was added the Operations Department "Night Orders" that the Control Rod Block IRM Quarterly Channel Calibrations must be completed prior to entering either Operational Mode 2 (Startup) or 5 (Refueling).

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Safety Significance

There is no safety significance associated with this event as demonstrated by the Control Rod Block IRM Channel Functional Test (CFT) Surveillances performed during the October 27-29, 1988 outage. The only difference between the Control Rod Block IRM Channel Functional Test Surveillances and the Control Rod Block Channel Calibration (CC) Surveillances is that the calibration surveillances provide steps to calibrate the IRM if the "as found" downscale and upscale control rod block trip setpoints are not set at the trip setpoint. Table 1 shows the "as found" downscale and upscale control rod block trip points for the CFTs performed during the outage.

	IRM							
	A	B	C	D	E	F	G	H
Downscale Trip	INOP	6	5	5	5	5	6	5
Upscale Trip	INOP	106	108	108	108	108	108	107

TABLE 1 - "As Found" Control Rod Block Trip Points
(Values in units of scale (0 TO 125))

The control rod block downscale trip setpoint is 5/125, with an allowable value of 3/125, and the upscale rod block trip setpoint is 108/125, with an allowable value of 110/125. All "as found" CFT trip points are either at the technical specification trip setpoint value or are more conservative and; therefore, there is no safety significance associated with this event. The IRM CFT and the IRM CC verify the IRM inoperative control rod blocks in an identical manner and, as a result, all were verified operable by the CFTs performed.

In addition, other Plant Systems provide redundant control rod blocks. The Source Range Monitor (SRM) System provides a redundant upscale control rod block from .0004% to 0.4% power. The IRM System monitors Plant power from .0004% to 40%. When the Mode Switch is in Operational Modes 2,3,4, or 5, the Average Power Range Monitor (APRM) System provides a redundant control rod block trip at 12% power. The Rod Worth Minimizer System ensures that control rods are withdrawn in a prescribed sequence to limit control rod worth. Accordingly, this event posed no threat to the health and safety of either the Public or Plant personnel.

Similar Events

LER 86-006 and LER 86-032

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

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

EIIS InformationText ReferenceEIIS Reference

System Component

Intermediate Range Monitor (IRM) System (detector)
Main Steam System (MS)
Plant Schedule Maintenance (SMS) System
Source Range Monitor (SRM) System
Average Power Range Monitor (APRM) System
Rod Worth Minimizer System

IG - - - - -
SB - - - - -
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IG - - - - -
IG - - - - -
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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

Docket No. 50-397

December 1, 1988

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: NUCLEAR PLANT NO. 2
LICENSEE EVENT REPORT NO. 88-035

Dear Sir:

Transmitted herewith is Licensee Event Report No. 88-035 for the WNP-2 Plant. This report is submitted in response to the report requirements of 10CFR50.73 and discusses the items of reportability, corrective action taken, and action taken to preclude recurrence.

Very truly yours,



C.M. Powers (M/D 927M)
WNP-2 Plant Manager

CMP:lg

Enclosure:
Licensee Event Report No. 88-035

cc: Mr. John B. Martin, NRC - Region V
Mr. C.J. Bosted, NRC Site (M/D 901A)
INPO Records Center - Atlanta, GA
Ms. Dottie Sherman, ANI
Mr. D.L. Williams, BPA (M/D 399)

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