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SWANK,D.A. Washington Public Power Supply System
BAKER,J.W. Washington Public Power Supply System
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 91-031-00:on 911104,determined that intermediate-range monitor control rod block channel calibrs not performed at TS required frequency.Caused by less than adequate procedures.Calibr procedures performed.W/911127 ltr.

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TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

Docket No. 50-397

November 27, 1991
G02-91-0217

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

Subject: NUCLEAR PLANT NO. 2
LICENSEE EVENT REPORT NO. 91-031

Dear Sir:

Transmitted herewith is Licensee Event Report No. 91-031 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,

J. W. Baker
WNP-2 Plant Manager

Enclosure:
Licensee Event Report No. 91-031

cc: Mr. John B. Martin, NRC - Region V
Mr. C. Sorensen, NRC Resident Inspector (M/D 901A)
INPO Records Center - Atlanta, GA
Ms. Dottie Sherman, ANI
Mr. D. L. Williams, BPA (M/D 399)
NRC Resident Inspector - walk over copy

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NRC FORM 366 (6-89)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104
EXPIRES: 4/30/92

ESTIMATED BURDEN PER RESPONSE TO COMPLY WTH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Washington Nuclear Plant - Unit 2	0 5 0 0 0 3 9 7	1 OF 0 4

TITLE (4) Intermediate Range Monitors Control Rod Block Channel Calibrations Not Performed At The Required Frequency

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)
										0 5 0 0 0
1 1	0 4	9 1	9 1	— 0 3 1	— 0 0	1 1	2 7	9 1		0 5 0 0 0

OPERATING MODE (9)	3	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
POWER LEVEL (10)	0 0 0	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 (Specify in Abstract below and in Text, NRC Form 366A)
		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)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
	AREA CODE
D. A. Swank, Compliance Engineer	5 0 9 3 7 7 - 4 4 5 1

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)		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 4, 1991 it was determined that the procedures performed to satisfy the Intermediate Range Monitors (IRMs) Control Rod Block function quarterly (every 92 days) Channel Calibration requirements did not meet the Technical Specification definition of a Channel Calibration. This condition is a deviation from the Technical Specifications and is reportable per 10CFR50.73(a)(2)(i)(B).

As an immediate corrective action, the 18-month IRM Reactor Protection System (RPS) Channel Calibration procedures were performed. These procedures also satisfy the quarterly IRM Control Rod Block Channel Calibration requirements.

The root cause of this event was procedures that were less than adequate. The IRM Control Rod Block quarterly surveillance procedures did not perform a complete Channel Calibration. Procedures used to satisfy the IRM Control Rod Block function Channel Calibration requirements will be revised to include those steps necessary to constitute a Channel Calibration.

This event was not safety significant since an IRM Control Rod Block function Channel Calibration was performed every 18 months as part of the IRM RPS Channel Calibration. The IRM Control Rod Block function is not required for accident prevention and mitigation since the licensing basis accidents are mitigated by the RPS system trips (Average Power Range Monitors (APRMs) and IRMs). Additionally, the APRMs also provide Control Rod Block trips.

This event posed no threat to the health and safety of either the public or Plant personnel

Plant Conditions

Plant Mode - 3 (HOT SHUTDOWN)
Power Level - 0%

Event Description

On November 4, 1991 as a result of a procedural review it was determined that the surveillance procedures used to perform the Channel Calibration of the IRM Control Rod Block functions did not completely verify the required functions. Surveillance procedures PPMs 7.4.3.6.4.21 through 7.4.3.6.4.28 were intended to satisfy Technical Specification Surveillance Requirements 4.3.6.4.b and d which require Channel Calibrations of the IRM Control Rod Block Upscale and Downscale trips be performed quarterly when the Plant is in Operational Conditions 2 (Startup) and 5 (Refueling). It was determined that although the procedures tested the required trip functions, they did not perform a Channel Calibration as defined by the Technical Specifications.

In addition to the PPMs mentioned above, other surveillance procedures are performed at an 18-month frequency to satisfy the IRM RPS Channel Calibration requirements. These additional procedures perform a Channel Calibration of both the IRM RPS and Control Rod Block functions. Therefore, an adequate Channel Calibration of the IRM Control Rod Block function was performed at least every 18 months and a calibration of the trip unit portion of the channel was performed quarterly when the Plant was in the applicable Operational Conditions.

Immediate Corrective Action

The procedures which calibrate both the IRM RPS and Control Rod Block functions were performed.

Further Evaluation and Corrective Action

A. Further Evaluation

1. Performance of the Channel Calibration for the IRM Control Rod Block functions less frequently than every 92 days while in the applicable Operational Conditions is a deviation from the Plant's Technical Specifications and is reportable pursuant to the requirements of 10CFR50.73(a)(2)(i)(B).

2. The root cause of this event was less than adequate procedures in that the procedures performed to satisfy the IRM Control Rod Block Channel Calibration requirements did not satisfy the Technical Specification definition of a Channel Calibration. Specifically, the procedures used performed a calibration of the DC amplifier and the trip units, but did not perform a calibration of each of the required components in the instrument channel. Further review revealed that this condition has existed since initial Plant startup.

3. The surveillance procedures used to test the Average Power Range Monitors and the Source Range Monitors were reviewed and it was verified that they satisfy the applicable Technical Specification requirements.

4. No systems, structures, or components were inoperable prior to the start of this event that contributed to the event.

B. Further Corrective Action

1. PPMs 7.4.3.6.4.21 through 7.4.3.6.4.28 will be revised to include the necessary steps to satisfy the IRM Control Rod Block Channel Calibration requirements.

2. As documented in WNP-2 LER 91-013-02, a Quality Action Team has been authorized to address potential improvements in Technical Specification compliance at WNP-2.

Safety Significance

The IRM Control Rod Block trip units were calibrated every quarter, and the entire channel including trip units was calibrated on an 18-month frequency. The reliability of the IRM Control Rod Block function is adequately assured by an 18-month testing frequency just as the IRM RPS function is required to be calibrated only on an 18-month periodicity. The APRMs provide a control rod block function that is in addition to the APRM and IRM RPS trips. As detailed in the Final Safety Analysis Report, WNP-2 does not require any of the control rod blocks to meet the licensing basis. Based on the criteria presented above it was determined that this event had no safety significance.

Similar Events

There have been previous instances of reportable events resulting from improper interpretation of a Technical Specification. LER 91-002 documented a case where jet pump testing did not meet the requirements imposed by a literal reading of the Technical Specification in that Specification 3.4.1.2 requires jet pump operability testing be performed "when both recirculation loops are operating at the same flow control valve position." The testing had been performed with matching reactor recirculation loop flows instead of matching flow control valve positions. The procedure was changed to achieve compliance, and a Technical Specification Amendment Request was submitted to allow testing with matching flows. LER 91-027 reported a condition where jet pump operability testing was not being performed in the required conditions. Plant procedures were revised and a Technical Specification Amendment request will be submitted to clarify the requirements. LER 91-013 documented several Technical Specification deviations.

The general corrective action identified in LER 91-013 was the formation of a Quality Action Team to address Technical Specification process improvements at WNP-2. The charter of the group is to propose revision to the Technical Specification Surveillance program to preclude similar problems from recurring.

EIIS Information

Text Reference	EIIS Reference System	EIIS Reference Component
Intermediate Range Monitors	IG	
Average Power Range Monitors	IG	
Source Range Monitors	IG	
Reactor Protection System	JC	