

# CATEGORY 1

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 RECIP. NAME      RECIPIENT AFFILIATION

SUBJECT: LER 96-005-00: on 960624, determined missed surveillance test re channel check of Average Power Range Monitor. Caused by inadequate procedures. Revised surveillance procedure re when APRM checks must be performed. W/960724 ltr.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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July 24, 1996  
GO2-96-145

Docket No. 50-397


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

Subject: **NUCLEAR PLANT WNP-2, OPERATING LICENSE NPF-21  
LICENSEE EVENT REPORT NO. 96-005-00**

Transmitted herewith is Licensee Event Report No. 96-005-00 for the WNP-2 Plant. This report is submitted in response to the reporting requirements of 10CFR50.73 and discusses the items of reportability, corrective action taken, and action taken to preclude recurrence.

Should you have any questions or desire additional information, please call me or L.C. Fernandez at (509) 377-4147.

Respectfully,

  
P. R. Bemis  
Vice President, Nuclear Operations  
(Mail Drop PE23)

PRB:CJF:lr  
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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

PAGE (3)

1 OF 3

TITLE (4)

Failure to Comply With Technical Specification Surveillance Requirement Due to Inadequate Procedures

EVENT DATE (5)

MONTH DAY YEAR  
0 6 2 4 9 6

LER NUMBER (6)

YEAR SEQUENTIAL NUMBER REVISION NUMBER  
9 6 0 0 5 0 0

REPORT DATE (7)

MONTH DAY YEAR  
0 7 2 4 9 6

OTHER FACILITIES INVOLVED (8)

FACILITY NAMES DOCKET NUMBERS(S)  
0 5 0 0 0 0 0 0 0 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)

0 2 4

20.402(b)  
20.405(a)(1)(i)  
20.405(a)(1)(ii)  
20.405(a)(1)(iii)  
20.405(a)(1)(iv)  
20.405(a)(1)(v)

20.405(C)  
50.36(c)(1)  
50.36(c)(2)  
50.73(a)(2)(i)  
50.73(a)(2)(ii)  
50.73(a)(2)(iii)

50.73(a)(2)(iv)  
50.73(a)(2)(v)  
50.73(a)(2)(vii)  
50.73(a)(2)(viii)(A)  
50.73(a)(2)(viii)(B)  
50.73(a)(2)(x)

73.71(b)  
73.73(c)  
OTHER (Specify in Abstract below and in Text, NRC Form 366A)

LICENSEE CONTACT FOR THIS LER (12)

NAME

C.J. Foley, Licensing Engineer

TELEPHONE NUMBER

AREA CODE

5 0 9 3 7 7 - 4 3 2 5

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) ☒ NO

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

ABSTRACT (16)

At 0900 hours on June 24, 1996, with WNP-2 at approximately 24% power in Mode 1, a surveillance channel check required to verify Average Power Range Monitor flow signal channel functionality on a daily basis was discovered to have been inadvertently omitted on two non-consecutive days, contrary to the requirements of Technical Specification 3.3.1.

The cause of the event was reactor plant startup and surveillance procedures that were incorrect or omitted relevant information. A surveillance procedure governing daily and shift instrument checks during Modes 1, 2, and 3 did not identify the Average Power Range Monitor flow signal channel check as being required in Mode 1. Two other procedures stated incorrectly that the surveillance was required only after reaching 25% power, contrary to Technical Specification 3.3.1 which requires the test to be performed in Mode 1 regardless of power level. The required surveillance test had been completed approximately 7.3 hours prior to discovery of previous omissions, and the Reactor Protection System neutron trip function had been functional throughout the period. Consequently, the event had no safety significance.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION										
FACILITY NAME (1)		DOCKET NUMBER (2)			LER NUMBER (8)			PAGE (3)		
Washington Nuclear Plant - Unit 2		0   5   0   0   0   3   9   7			Year	Number	Rev. No.			
					96	005	00	2	OF	3
TITLE (4) Failure to Comply With Technical Specification Surveillance Requirement Due to Inadequate Procedures										

### Plant Conditions Prior to the Event:

At the time of the event, the plant was in Mode 1 with the reactor approximately at the 24% thermal power level. The plant was starting up after an unplanned reactor scram.

### Description of Event:

At approximately 0900 hours on June 24, 1996, an operator reviewing completed procedures governing activities being performed as part of restarting the plant, determined that a surveillance test had not been consistently performed within the period required by the Technical Specifications. The required surveillance test was to perform a channel check of the Average Power Range Monitor (APRM) [IG] flow signal to verify operability of the APRM flow biased simulated thermal power high range trip channels. The test is required to be performed on a daily basis when in Mode 1, which had been entered at 0914 hours on June 20, 1996. The required test had been completed on June 22, 1996, and again on June 24, 1996. However, the test had not been performed on June 21 or 23, resulting in a violation of Technical Specification 3.3.1.

### Immediate Corrective Actions:

The required surveillance test had been completed approximately 7.3 hours earlier, at 0139 hours on June 24, 1996, demonstrating that flow rate data was being correctly received and utilized by the APRM system. Consequently, no immediate corrective action was necessary.

### Root Cause:

The root cause of this event was reactor plant startup and surveillance procedures that were incorrect or omitted relevant information. The surveillance procedure being used contains three separate parts covering three different surveillance requirements: jet pump [P] operability, RRC loop flow balance, and the Average Power Range Monitor flow channel check. The "Purpose" section of this surveillance procedure included the statement, "This surveillance is performed within 24 hours of thermal power exceeding 25% of rated thermal power, in LE [less than or equal to] 4 hours after an idle recirculation loop is returned to operation, and daily thereafter when the reactor is in operational conditions 1 or 2." That is an incorrect statement since it does not reflect the requirement of Technical Specification 3.3.1 to perform the APRM flow signal channel check on a daily basis when in Mode 1. The procedure governing reactor plant startup stated that the particular surveillance procedure was required after reaching 25% reactor power, and therefore also did not address the Technical Specification requirement to perform the APRM flow signal channel check on a daily basis in Mode 1. The surveillance procedure governing shift and daily instrument checks did not identify the APRM flow signal channel check as being a required action during Mode 1.



FACILITY NAME (1)		DOCKET NUMBER (2)		LER NUMBER (8)			PAGE (3)		
Washington Nuclear Plant - Unit 2		0   5   0   0   0   3   9   7		Year	Number	Rev. No.			
				9   6	0   0   5	0   0	3	OF	3
TITLE (4) Failure to Comply With Technical Specification Surveillance Requirement Due to Inadequate Procedures									

These procedural deficiencies required the operating staff to rely on past experience and acquired knowledge to assure that all Technical Specification requirements were met for the proper conditions. This led to the inconsistent performance of the surveillance test. Consequently, the root cause of this event was reactor plant startup and surveillance procedures that were incorrect or omitted relevant information.

#### Further Corrective Actions:

Corrective actions were implemented to preclude recurrence. The implementing surveillance procedure was changed to clearly identify the purposes and conditions under which it is applicable. The procedure governing reactor plant startup was changed to clearly identify when the APRM flow signal channel checks must be performed per Technical Specification 3.3.1. The surveillance procedure governing shift and daily instrument checks during Modes 1, 2, and 3 was revised to require specific verification that the APRM flow signal channel check was completed as required by the Technical Specifications.

#### Safety Significance:

The event had no safety significance. The required surveillances had been performed on June 22 and 24 verifying operability of the APRM flow signal input, and were performed as required by Technical Specifications after June 24. The APRM high neutron trip function was functional during this entire period, assuring that the Reactor Protection System [JC] would scram the reactor in the event of an unexpected neutron spike.

#### Other Previous Occurrences:

Licensee Event Report 96-003-00 identified an event involving a surveillance test inadvertently omitted due to the same inadequate procedures during a plant startup. This event had occurred on June 15, 1996. If corrective actions for this previous event had been completed prior to the LER 96-005-00 event, they could have afforded the opportunity to identify and correct the procedural deficiencies that led to LER 96-005-00.