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AUTH.NAME AUTHOR AFFILIATION
PFITZER,B. Washington Public Power Supply System
WEBRING,R.L. Washington Public Power Supply System
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 96-006-00:on 960709,average power range monitor rod block downscale surveillance not performed prior to entry into mode 1.Cause by long-standing misinterpretion of requirements of TSs.Procedures revised.W/960808 ltr.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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August 8, 1996
GO2-96-157

Docket No. 50-397

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

Gentlemen:

Subject: **NUCLEAR PLANT WNP-2, OPERATING LICENSE NPF-21, LICENSEE EVENT REPORT NO. 96-006-00**

Transmitted herewith is Licensee Event Report No. 96-006-00 for WNP-2. This report is submitted in response to the reporting requirements of 10CFR73 and discusses the items of reportability, corrective action taken, and action taken to preclude recurrence.

Should you have any questions or desire additional information regarding this matter, please call me or Ms. Lourdes Fernandez at (509) 377-4147.

Respectfully,

R. L. Webring
Vice President, Operations Support/PIO
Mail Drop PE08

Enclosure

cc: LJ Callan, NRC RIV
TG Colburn, NRR
KE Perkins, Jr., NRC RIV, WCFO
NS Reynolds, Winston & Strawn
NRC Sr. Resident Inspector, MD927N (2)
INPO Records Center - Atlanta, GA
DL Williams, BPA, MD399

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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 4

TITLE (4) AVERAGE POWER RANGE MONITOR ROD BLOCK DOWNSCALE SURVEILLANCE NOT PERFORMED PRIOR TO ENTRY INTO MODE 1

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)
07	09	96	96	- 0 0 6 -	0 0	08	08	96	N/A	0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9)	1
POWER LEVEL (10)	0 5 5

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR: (11)

__ 20.402(b)	__ 20.405c	__ 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	
Bill Pfitzer, Licensing Engineer	509	377-2419

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 (16)

On July 9, 1996 at 1630, with the plant operating at 55 percent power in Mode 1, a review of Technical Specification Surveillance requirements associated with rod block instrumentation revealed that the Average Power Range Monitor (APRM) rod block downscale Channel Calibration and/or Channel Functional Tests (CC & CFT) were not performed on two occasions prior to plant startups. The required tests were successfully performed within 24 hours after entry into the applicable mode. A similar delay in completion of surveillances associated with plant startup was found in several other surveillances. This delay in completion of surveillances was allowed by a Technical Specification Interpretation (TSI). A review of this interpretation has found it to be in error.

The root cause of the event was a long-standing misinterpretation of the requirements of Technical Specifications 4.0.3 and 4.0.4 and the guidance in Generic Letter (GL) 87-09, as implemented by the Technical Specification Surveillance Improvement Program (TSSIP) and documented by the TSI. This interpretation has been revisited. TSSIP positions and surveillance procedures will be changed as necessary.

All potential mode change restrictions will be resolved on implementation of the Improved Technical Specifications (ITS). The surveillance procedures impacted by this interpretation have been reviewed and changes to the procedure or Technical Specifications surveillance requirement will be made as necessary.

The safety significance of this event is minimal.

Event Description

A review of Technical Specification Surveillance requirements associated with rod block instrumentation revealed that the APRM [IG] rod block downscale CC & CFTs were not performed prior to plant startups on June 11 and June 28, 1996.

The APRM downscale rod block CC & CFTs were performed in association with these two startups after placing the Mode switch in RUN and with power level >5% at 20:33 on 6/20/96 and at 19:33 on 6/29/96 (within 24 hrs of reaching Mode 1).

Technical Specification Table 4.3.6-1 lists the requirements for surveillance testing for various rod block trip functions. APRM downscale rod block CC is required quarterly in Mode 1 and the APRM downscale rod block trip function CFT (item 2.c note b) is required to be performed within 24 hours prior to startup if not performed within the previous 7 days. Contrary to these requirements, Mode 1 was entered on 6/20/96 without prior performance of the APRM downscale rod block CC or CFT and on 6/29/96 without prior performance of the APRM downscale rod block CFT.

Immediate Corrective Action

A Problem Evaluation Request was initiated.

Further Evaluation

The Licensing recommendation during the last refueling outage was to defer APRM downscale rod block CFT surveillance completion until Mode 1 with the APRM downscales cleared. This recommendation was based on the historical position that in cases where intrusive measures are required to test equipment prior to reaching the operational condition for which it is required, the 24 hours allowed by Technical Specification 4.0.3 could be applied to Technical Specification 4.0.4. This position was considered corroborated by the recommendations of GL 87-09 which recommended changes to Technical Specifications to allow performance of certain surveillances within 24 hours after entering the required operational condition. Upon review, this interpretation has been found to be in error.

In this instance the three APRM downscale channels and single Rod Block Monitor downscale channel associated with each Reactor Protection System (RPS) [JC] combine in a series circuit to cause the rod block at the Reactor Manual Control System (RMCS) module. The rod block generated by these downscales is bypassed when the mode switch is not in RUN. Therefore, it is not possible to individually test the APRM downscale rod block alarm or rod block trip functions when not in RUN without significant jumpering to defeat redundant APRM downscale trip signals, lifting leads for alarm contacts, and simulating mode switch input to the RMCS by lifting additional leads and jumpering contacts of the mode switch. This would be further complicated by the necessity to shift the jumpers and lifted leads as each APRM is tested. This degree of intrusive testing is not recommended per IEEE 338 for functional testing.

This misinterpretation has been in place since initial startup. An opportunity to correct this misinterpretation occurred in February 1989 when WNP-2 requested Technical Specification changes to Technical Specifications 3.0.4, 4.0.3 and 4.0.4 as recommended by GL 87-09. The requested change to Technical Specification 3.0.4 would have alleviated this problem by allowing entry into an operational condition for which an unperformed surveillance is required, and simultaneously entering into the LCO for the unsurveilled equipment until the required surveillance is completed, provided the LCO did not require shutdown. NRC staff reviews and clarifications of the change indicated that the sections of the submittal dealing with Technical Specification 3.0.4 required further analysis and the Supply System withdrew the request.

This misinterpretation of GL 87-09 was subsequently incorporated into TSSIP review of surveillance testing procedures and documented in a TSI. Upon review of this position it was found to be in error. In retrospect, resolution of this issue was incomplete due to misinterpretation of the guidance in GL 87-09.

Independent of this issue, the process for issuing TSIs has been revised and strengthened. Interpretations have been included into the licensing document change process which requires a Licensing Basis Impact Determination. This ensures adequate technical and management review prior to issuance of the TSI. In addition, TSIs are not expected to be used upon ITS implementation. The enhanced bases will provide necessary supporting documentation and information.

A review of plant procedures where this misinterpretation of regulatory guidance could have resulted in mode changes without performance of the required surveillances identified other similar applications of this misinterpretation:

- Turbine throttle valve RPS trips
- APRM fixed neutron flux upscale trips
- RUN Mode control rod block trips

In these cases the required surveillance were also successfully performed after entry into the applicable mode.

Based on WNP-2 operating history, it is likely these violations of Technical Specification 4.0.4 have occurred on multiple occasions.

Root Cause

Misinterpretation of the requirements of Technical Specifications 4.0.3 and 4.0.4 and of the guidance in GL 87-09, from initial plant licensing, is considered to be the root cause of this event.

Further Corrective Actions

The TSI relating to this issue will be voided and the revised interpretation will be incorporated into TSSIP review process.

The remaining TSIs will be reviewed for technical basis and impact on implementing procedures.

The surveillance procedures impacted by this interpretation have been reviewed and changes to either the surveillance procedure or the surveillance requirement contained in Technical Specifications will be made as necessary. In preparation for recovery from an unexpected shutdown the necessary Technical Specification changes will be requested.

Training of affected personnel will be conducted to ensure the lessons learned are communicated.

Assessment of Safety Consequences

The level of safety significance of the 24 hour delay in performance of surveillances required prior to changes in operational conditions is commensurate with the safety significance of the 24 hour delay allowed by Technical Specification 4.0.3. The safety significance of this delay is minimal and has been endorsed by the staff in Technical Specification 4.0.3, and in more detail in GL 87-09 and NUREG 1434.

This LER is submitted to document plant operation prohibited by Technical Specifications due to untimely performance of required surveillances.

Previous Similar Events

LER 93-10, through revision 8, provided results of TSSIP problem identification and several examples of issues related to misinterpretation or misunderstanding of requirements. The LER identifies numerous actions associated with surveillance testing tracked through PTL. This LER also heightened awareness of literal Technical Specification compliance and resulted in the identification of additional issues. For example, LER 94-16 documents a nonconservative interpretation which accepted a post maintenance test in lieu of a surveillance. LER 95-03 identified a misunderstanding Technical Specification requirements for control room indication.

It has been noted that ITS resolves the mode change issues described in this LER. Implementation of the ITS and use of the enhanced ITS bases are expected to preclude future misinterpretations of regulatory requirements.