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FACIL:STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
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SUBJECT: LER 87-028-00:on 871217,personnel error results in incomplete Tech Spec sample analysis.

W/8 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 1
TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:Standardized plant. 05000528

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	LICITRA,E	1	1	DAVIS,M	1	1
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	AEOD/DOA	1	1	AEOD/DSP/NAS	1	1
	AEOD/DSP/ROAB	2	2	AEOD/DSP/TPAB	1	1
	ARM/DCTS/DAB	1	1	DEDRO	1	1
	NRR/DEST/ADS	1	0	NRR/DEST/CEB	1	1
	NRR/DEST/ELB	1	1	NRR/DEST/ICSB	1	1
	NRR/DEST/MEB	1	1	NRR/DEST/MTB	1	1
	NRR/DEST/PSB	1	1	NRR/DEST/RSB	1	1
	NRR/DEST/SGB	1	1	NRR/DLPQ/HFB	1	1
	NRR/DLPQ/QAB	1	1	NRR/DOEA/EAB	1	1
	NRR/DREP/RAB	1	1	NRR/DREP/RPB	2	2
	NRR/DRIS/SIB	1	1	NRR/PMAS/ILRB	1	1
	REG FILE 02	1	1	RES TELFORD,J	1	1
	RES/DE/EIB	1	1	RES/DRPS DIR	1	1
	RGN5 FILE 01	1	1			
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NRC Form 366 (9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Palo Verde Unit 1	0 5 0 0 0 5 2 8	1 OF 0 3

TITLE (4)

Personnel Error Results In Incomplete Technical Specification Sample Analysis

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)
									N/A	0 5 0 0 0
1 2	1 7	8 7	8 7	— 0 2 8	— 0 0	0 1	1 5	8 8	N/A	0 5 0 0 0

OPERATING MODE (9)	5	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
Timothy D. Shriver, Compliance Manager	6 0 2 — 3 9 3 - 2 5 2 1

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)

At approximately 1320 MST on December 17, 1987, Palo Verde Unit 1 was in Mode 5 (COLD SHUTDOWN) when it was discovered that two weekly Plant Vent Radiation Monitor (VL)(IL)(RI) samples had not been retained for inclusion with the quarterly composite Strontium - 89/90 sample. This resulted in an inability to meet the sampling requirements of Technical Specification 4.11.2.1.2.

The root cause of this event was a cognitive personnel error in that a chemistry technician (utility, non-licensed) did not take sufficient measures to ensure that the samples were retained. Procedural controls were evaluated and determined to be adequate.

As corrective action to prevent recurrence, the responsible individual will receive appropriate disciplinary action. Unit Chemistry Department personnel will receive appropriate training, and additional controls for tracking and storing samples will be evaluated.

A similar event was reported in Unit 1 LER 86-007-00.

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NRC Form 366

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
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Palo Verde Unit 1	0 5 0 0 0 5 2 8	8 7	— 0 2 8	— 0 0	0 2 OF 0 3

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

At approximately 1320 MST on December 17, 1987, Palo Verde Unit 1 was in Mode 5 (COLD SHUTDOWN) with the reactor coolant system (RCS)(AB) at approximately 81°F and atmospheric pressure when it was determined that two weekly Plant Vent Radiation Monitor's (VL)(IL)(RI) particulate filters (FLT) had not been saved for quarterly composite Strontium - 89/90 analysis resulting in an inability to fully meet Technical Specification 4.11.2.1.2 surveillance requirements.

Technical Specification (T.S.) 4.11.2.1.1 requires that a Plant Vent Radiation Monitor particulate sample be analyzed four times per month for principal gamma emitters. Additionally, a monthly composite sample analysis is required for gross alpha, and a quarterly composite sample analysis is required for Strontium - 89/90. The sampling methodology employed involves changing the filter media in the Plant Vent Radiation Monitor weekly, analyzing the filter media for principal gamma emmitters and gross alpha, and then retaining the filter media for off-site quarterly composite Strontium - 89/90 sample analysis. The monthly composite requirement is satisfied by totaling the weekly analysis results and verifying that monthly limits are not exceeded. Palo Verde does not have the capability to analyze for Strontium - 89/90, therefore, the weekly samples are retained for quarterly off-site analysis by an approved vendor.

During the process for preparing the quarterly composite sample for off-site shipment on December 17, 1987, it was discovered by a technician (utility, non-licensed) that two weekly samples were missing. An investigation revealed that the weekly samples that were taken on November 26, 1987 and December 3, 1987 for the Plant Vent Radiation Monitor's particulate filters were analyzed for gross alpha and principal gamma emitters by Chemistry Department personnel (utility, non-licensed). The filters were subsequently re-analyzed on December 3, 1987 and December 10, 1987, respectively, for gross alpha activity per Chemistry Department instructions. Following the second analysis, the filter media were apparently misplaced as they could not be located for inclusion with the quarterly composite sample. Based upon not being able to locate the samples for the period of November 19, 1987 to December 3, 1987, it was determined that the requirements of Specifications 4.11.2.1.2 could not be fully met since the quarterly composite sample requirement for Strontium - 89/90 could not be completed.

The root cause of this event is cognitive personnel error on the part of a Unit 1 Technician (utility, non-licensed) in that the Technician did not follow established procedural controls. The controls were evaluated by Unit 1 Chemistry Department management (utility, non-licensed) and determined to be adequate. The personnel error was determined not to be a direct result of an error in an approved procedure or a result of the activity not being covered by an approved procedure. The area where the samples were being stored was being remodeled and may have contributed to the event. There were no other unusual characteristics of the work location that contributed to the event.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Palo Verde Unit 1	0 5 0 0 0 5 2 8	8 7	— 0 2 8	— 0 0	0 3 OF 0 3

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

As corrective action to prevent recurrence, the involved individual will receive appropriate retraining and disciplinary action. Additionally, the event has been discussed with all Unit 1 Chemistry Department personnel to ensure that they are aware of the requirements for retaining samples and to reiterate the necessity of procedural adherence.

There were no structures, systems or components inoperable at the start of the event that contributed to the event. There were no failed components. There were no automatic or manually initiated safety responses that occurred and none were necessary.

There was no threat to the health and safety of the public as a result of this event. Specification 3.11.2.1 is provided to ensure that the dose from gaseous effluents from all units on site at any time at and beyond the SITE BOUNDARY will be within the annual dose limits of 10CFR Part 20 to UNRESTRICTED AREAS. The period represented by the missing samples makes up only a portion of the overall composite sample. All previous Strontium analyses have resulted in meeting Technical Specification requirements. Additionally, no situations existed during the two week period which would be expected to release abnormal levels of Strontium - 89/90. The samples were analyzed for gross alpha and principal gamma emmitters and no abnormal activity levels were noticed. Based upon the above, there were no safety consequences or implications from this event.

A similar event occurred as reported in Unit 1 LER number 86-007-00 dated March 28, 1986. The event reported therein discussed a sequence of events similar to that described above and as corrective action, applicable procedures were revised. As noted herein, the procedure revision is considered to have been adequate. However as additional corrective action, the forms utilized by Chemistry Department personnel for recording data obtained from samples will be revised to include precautionary notes to provide further assurance that the samples will not be inadvertently discarded. Furthermore, a more formal methodology for tracking and/or storing samples will be evaluated. This event will be reviewed by Chemistry Department personnel as additional training. The corrective actions discussed above will be implemented in Units 1, 2, and 3.

Arizona Nuclear Power Project
P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

192-00334-JGH/TDS/DAJ
January 15, 1988

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

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket No. STN 50-528
Licensee Event Report 87-028-00
File: 88-020-404

Attached please find Licensee Event Report (LER) No. 87-028-00 prepared and submitted pursuant to 10CFR 50.73. In accordance with 10CFR 50.73(d), we are herewith forwarding a copy of the LER to the Regional Administrator of the Region V office.

If you have any questions, please contact T. D. Shriver, Compliance Manager at (602) 393-2521.

Very truly yours,

J. G. Haynes
Vice President
Nuclear Production

JGH/TDS/DAJ/kj

Attachment

cc: O. M. DeMichele (all w/a)
E. E. Van Brunt, Jr.
J. B. Martin
J. R. Ball
R. C. Sorenson
E. A. Licitra
A. C. Gehr
INPO Records Center

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