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 FACIL:STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
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 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-002-00:on 920117,missed TS actions while radiation
 was inoperable.Caused by personnel error.Containment air
 grab sample was taken & analyzed.W/920224 ltr.

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NOTES:STANDARDIZED PLANT

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JAMES M. LEVINE
VICE PRESIDENT
NUCLEAR PRODUCTION

192-00774-JML/TRB/RKR
February 24, 1992

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Mail Station P1-37
Washington, D.C. 20555

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket No. STN 50-528 (License No. NPF-41)
Licensee Event Report 92-002-00
File: 92-020-404

Attached please find Licensee Event Report (LER) 92-002-00 prepared and submitted pursuant to 10CFR50.73. In accordance with 10CFR50.73(d), a copy of this LER is being forwarded to the Regional Administrator, NRC Region V.

If you have any questions, please contact T. R. Bradish, Compliance Manager, at (602) 393-5421.

Very truly yours,

James M. Levine

JML/TRB/RKR/nk

Attachment

cc: W. F. Conway (all with attachment)
J. B. Martin
D. H. Coe
INPO Records Center

9202270171 920224
PDR ADDCK 05000528
S PDR

JE27

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Palo Verde Unit 1										DOCKET NUMBER (2) 0 5 0 0 0 5 1 2 1 8										PAGE (3) 1 OF 0 1 7																																			
TITLE (4) Missed Technical Specification Action While Radiation Monitor Was Inoperable																																																							
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)															
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0 1			1 7			9 2			9 2			0 0			2 0			0 0			0 2			2 4			9 2			N/A													0 5 0 0 0 0												
OPERATING MODE (9) 1									THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																																														
POWER LEVEL (10) 2 9									20.402(b)									20.406(c)									60.73(a)(2)(iv)									73.71(b)																			
									20.406(a)(1)(i)									60.38(c)(1)									60.73(a)(2)(v)									73.71(c)																			
									20.406(a)(1)(ii)									60.38(c)(2)									60.73(a)(2)(vi)									OTHER (Specify in Abstract below and in Text, NRC Form 366A)																			
									20.406(a)(1)(iii)									60.73(a)(2)(i)									60.73(a)(2)(vii)(A)																												
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LICENSEE CONTACT FOR THIS LER (12)																																																							
NAME Thomas R. Bradish, Compliance Manager															TELEPHONE NUMBER 6 0 2 3 9 3 1 5 4 2 1																																								
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																																																							
CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NRC				CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NRC																																			
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 January 17, 1992, Palo Verde Unit 1 was in Mode 1 (POWER OPERATION) at approximately 29 percent power. At approximately 1000 MST on January 24, 1992, while performing a routine review of completed work documents, a Unit 1 Chemistry Supervisor discovered that on January 17, 1992, a containment air grab sample had not been taken within the Technical Specification (TS) allowed time limit while the containment building atmosphere radiation monitor (RU-1) was inoperable. RU-1 was taken out of service for corrective maintenance and declared inoperable at approximately 0825 MST on January 17, 1992. With RU-1 inoperable, TS Limiting Condition for Operation (LCO) 3.4.5.1, "Reactor Coolant System Leakage", ACTION a, requires that grab samples of the containment atmosphere be obtained at least once per 12 hours. The valid containment air grab samples were taken approximately 12 hours and 51 minutes apart.

The cause of this event was a personnel error by the day shift Control Room Assistant Shift Supervisor. As immediate corrective action, the containment isolation valves were opened and a containment air grab sample was taken and analyzed. The containment air grab samples taken at the beginning and end of this interval demonstrated that containment atmosphere radiation levels were normal during this event.

There have been no previous similar events reported pursuant to 10CFR50.73.

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I. DESCRIPTION OF WHAT OCCURRED:

A. Initial Conditions:

On January 17, 1992, Palo Verde Unit 1 was in Mode 1 (POWER OPERATION) at approximately 29 percent power.

B. Reportable Event Description (Including Dates and Approximate Times of Major Occurrences):

Event Classification: Operation prohibited by the plant's Technical Specification.

At approximately 1000 MST on January 24, 1992, while performing a routine review of completed work documents, a Unit 1 Radiation Monitoring System (RMS) Supervisor (utility, nonlicensed) discovered that on January 17, 1992, a containment air grab sample had not been taken within the Technical Specification (TS) allowed time limit while the containment building (NH) atmosphere radiation monitor (RU-1)(MON)(IL) was inoperable. RU-1 was taken out of service for corrective maintenance and declared inoperable at approximately 0825 MST on January 17, 1992. With RU-1 inoperable, TS Limiting Condition for Operation (LCO) 3.4.5.1, "Reactor Coolant System Leakage", ACTION a, requires that grab samples of the containment atmosphere be obtained at least once per 12 hours and analyzed within the subsequent 3 hours. An interval of approximately 12 hours and 51 minutes between valid containment air grab samples occurred on January 17, 1992. The containment air grab samples taken at the beginning and end of this interval demonstrated that containment atmosphere radiation levels were normal during this event.

RU-1 is part of the reactor coolant system (AB) leak detection system (IJ) to monitor and detect leakage from the reactor coolant system pressure boundary. RU-1 has two (2) channels (CHA)(IL). One channel monitors containment atmosphere gaseous radioactivity and the other channel monitors containment atmosphere particulate radioactivity.

Prior to this event, at approximately 0825 MST on January 17, 1992, RU-1 was taken out of service and declared inoperable to repair an oil leak on the monitor's sample pump (P)(IL). The day shift Control Room Assistant Shift Supervisor (utility, licensed) notified the day shift RMS technician (utility, nonlicensed) that RU-1 was being taken out of service for maintenance and that containment air grab samples would have to be taken in accordance with TS 3.4.5.1 ACTION a. The day shift Assistant Shift Supervisor also told the day shift RMS technician that RU-1 would be "isolated" during the maintenance. The day shift RMS

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technician thought that the term "isolated" meant RU-1 would be isolated from the containment air sample lines by the local RU-1 isolation valves and the grab sample connections would not be isolated. At approximately 0905 MST, a containment air grab sample was taken by the day shift RMS technician and analyzed by a Chemistry Technician (utility, nonlicensed). The sample procedure requires that containment air grab samples be taken every eight (8) hours to ensure compliance with the TS requirement to sample at least once every 12 hours. Prior to removal of the sample pump for maintenance, at approximately 0942 MST, RU-1 was isolated from the containment by closing and removing power from the operators (84)(IL) for the RU-1 inlet and outlet containment isolation valves (ISV)(IL). These valves isolate the containment air sample lines to RU-1 at their containment penetrations to ensure that there will be no unmonitored releases when the sample pump is removed.

At approximately 1710 MST, a containment air grab sample was taken and analyzed. The containment air grab sample is taken from the same containment air sample lines used by RU-1. The containment air grab sample is taken downstream of the containment isolation valves and upstream of the local RU-1 isolation valves. While taking the containment air grab sample, the day shift RMS technician saw that the sample pump was removed and that the local isolation valves were closed, isolating RU-1 from the containment air sample lines. However, the day shift RMS technician did not know that the containment isolation valves were closed. The containment air grab sample was turned over to the night shift RMS technician (utility, nonlicensed) to ensure the analysis was completed. The results of the analysis showed that the containment air grab sample had lower than expected activity and was not representative of the containment atmosphere. The night shift RMS technician attempted to take another containment air grab sample without realizing the containment isolation valves were closed. He verified proper flow and he also monitored radiation levels in the sample lines with a local monitor since the previous sample had lower than expected activity. Radiation levels did not increase as expected for containment air in the sample lines.

The night shift RMS technician contacted the night shift Assistant Shift Supervisor (utility, licensed) to verify that the valve lineup was correct for obtaining a containment air grab sample. The night shift Assistant Shift Supervisor incorrectly confirmed that the valve lineup was correct. Approximately 40 minutes later, the night shift Assistant Shift Supervisor realized that the containment air sample lines were isolated and contacted the night shift RMS technician. The containment isolation valves were opened and at approximately 2156 MST a containment air grab sample

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was taken. This was approximately 12 hours and 51 minutes after the initial containment air grab sample was taken. The night shift RMS technician incorrectly assumed that the 25 percent grace period allowed for TS surveillances also applied to this 12 hour sample interval. Therefore, he did not notify the Control Room that the 12 hour sample interval had been exceeded. The analysis of the containment air grab sample was completed at approximately 2315 MST. This was approximately 14 hours and 10 minutes after the last valid containment air grab sample was taken. This is within the maximum allowed time of 15 hours for taking (12 hours) and analyzing (3 hours) a sample in TS 3.4.5.1. RU-1 was returned to service at approximately 2300 MST on January 17, 1992.

RU-1 was inoperable for approximately 14 hours and 35 minutes. At approximately 1000 MST on January 24, 1992, while performing a routine review of completed work documents, a Unit 1 RMS Supervisor discovered that on January 17, 1992, a containment air grab sample had not been taken within the TS maximum allowed time limit of 12 hours while RU-1 was inoperable. The RMS Supervisor initiated a condition report and an investigation of this event was started in accordance with the APS Incident Investigation Program.

- C. Status of structures, systems, or components that were inoperable at the start of the event that contributed to the event:

Other than radiation monitor RU-1, no other structures, systems, or components were inoperable at the start of the event which contributed to this event.

- D. Cause of each component or system failure, if known:

Not applicable - no component or system failures were involved.

- E. Failure mode, mechanism, and effect of each failed component, if known:

Not applicable - no component failures were involved.

- F. For failures of components with multiple functions, list of systems or secondary functions that were also affected:

Not applicable - no failures of components with multiple functions were involved.

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- G. For a failure that rendered a train of a safety system inoperable, estimated time elapsed from the discovery of the failure until the train was returned to service:

Not applicable - no failures that rendered a train of a safety system inoperable were involved.

- H. Method of discovery of each component or system failure or procedural error:

Not applicable - there have been no component or system failures, or procedural errors which contributed to this event.

- I. Cause of Event:

The cause of this event was a personnel error by the day shift Assistant Shift Supervisor (utility, licensed) who allowed RU-1 to be taken out of service and entered the ACTION for TS 3.4.5.1 without ensuring that the TS ACTION could be met with the containment isolation valves closed (SALP Cause Code A: Personnel Error). As discussed in Section I.B, the containment isolation valves were closed, isolating both RU-1 and the grab sample connections for the containment air grab sample.

Contributing to this event was the lack of clear communication between the day shift Assistant Shift Supervisor and the day shift RMS technician. As discussed in Section I.B, the day shift Assistant Shift Supervisor notified the day shift RMS technician that RU-1 would be "isolated" during maintenance. The day shift RMS technician thought that the term "isolated" meant that RU-1 would be isolated by the local RU-1 isolation valves and the grab sample connections would not be isolated. The day shift RMS technician also contributed to this event when he did not verify that he could actually get the required containment air grab sample. The night shift Assistant Shift Supervisor contributed to this event when he incorrectly told the night shift RMS technician that the valve lineup was correct for taking a containment air grab sample.

No unusual characteristics of the work location (e.g., noise, heat, poor lighting) directly contributed to this event. There were no procedural errors which contributed to this event.

- J. Safety System Response:

Not applicable - there were no safety system responses and none were necessary.

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K. Failed Component Information:

Not applicable - no component failures were involved.

II. ASSESSMENT OF THE SAFETY CONSEQUENCES AND IMPLICATIONS OF THIS EVENT:

The maximum allowed Technical Specification (TS) sample interval of 12 hours was exceeded by approximately 51 minutes. Containment air grab samples taken at the beginning and end of this interval demonstrated that containment atmosphere radiation levels were normal during this event. The containment sump level and flow monitoring system, which is the other means for monitoring reactor coolant system pressure boundary leakage required by TS 3.4.5.1, was OPERABLE during this event. Based on the above conditions, there were no adverse safety consequences or implications as a result of this event. This event did not result in any challenges to fission product barriers or result in any releases of radioactive material. This event did not adversely affect safe operation of the plant or the health and safety of the public.

III. CORRECTIVE ACTION:

A. Immediate:

The containment isolation valves were opened and a containment air grab sample was taken and analyzed.

B. Action to Prevent Recurrence:

1. This event has been discussed with the operations personnel involved with this event. This event will be evaluated by the training department in accordance with an approved procedure for inclusion in industry events training for operations personnel in Units 1, 2, and 3. This evaluation is expected to be completed by March 31, 1992.
2. This event has been discussed with the RMS technicians involved in this event. The remaining RMS technicians in Units 1, 2, and 3 will be briefed on this event and made aware of managements expectation of strict compliance with TS ACTION requirements. These briefings are expected to be completed by March 31, 1992.
3. The sampling procedure has been revised to require that the RMS technician verify that the containment isolation valves are open prior to taking a containment air grab sample.

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IV. PREVIOUS SIMILAR EVENTS:

No other previous events have been reported pursuant to 10CFR50.73.

