

CATEGORY

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 FACIL: STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
 AUTH. NAME AUTHOR AFFILIATION
 MARKS, D.G. Arizona Public Service Co. (formerly Arizona Nuclear Power
 IDE, W.E. Arizona Public Service Co. (formerly Arizona Nuclear Power
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 99-002-00: on 990730, test mode trip bypass for EDG output
 breakers not surveilled. Cause under investigation. Operations
 personnel conservatively invoked SR 3.0.3 for SR 3.8.1.13.
 With 990827 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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05000528

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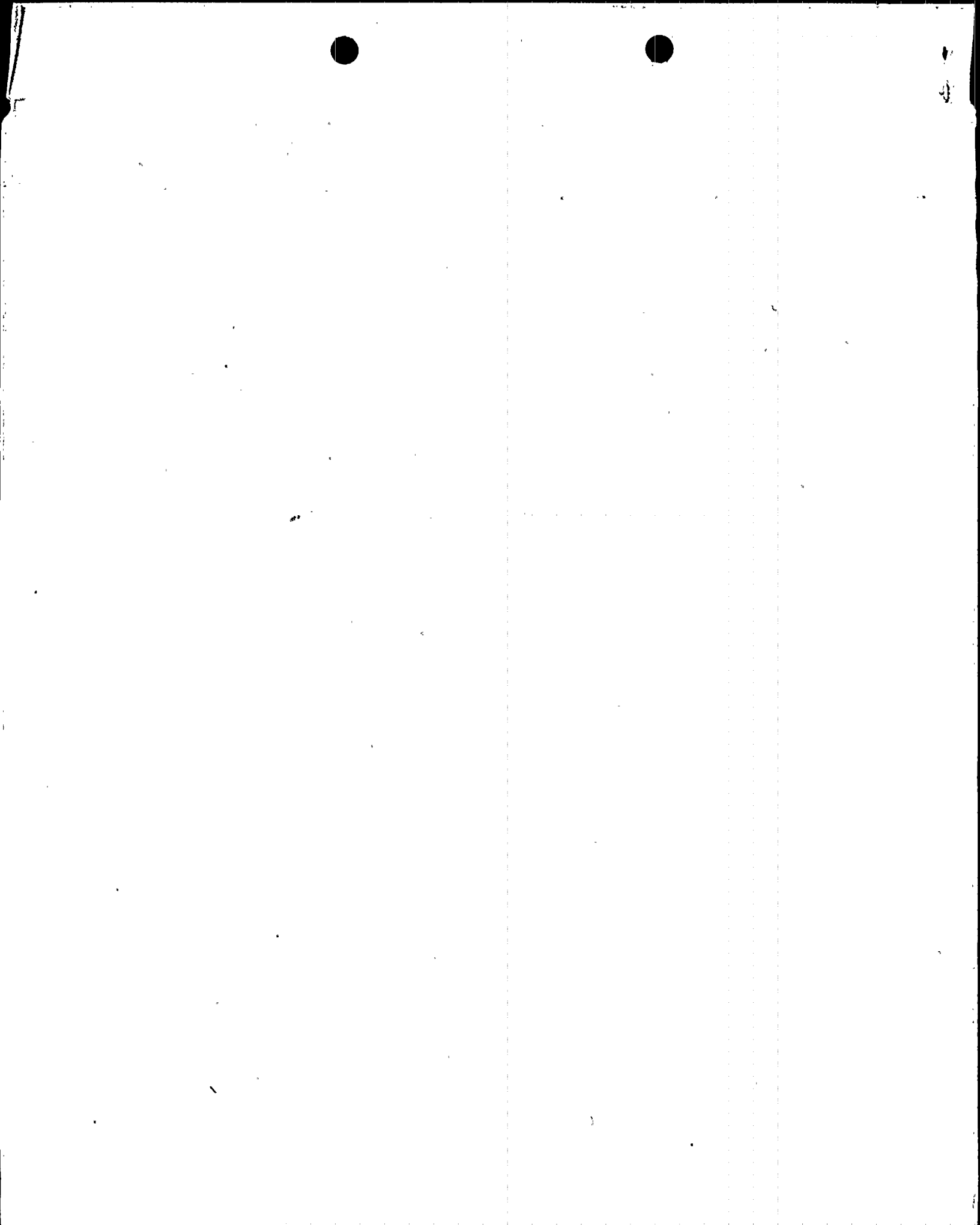
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192-01054 – WEI/DGM/RAS
August 27, 1999

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
License Nos. NPF-41/51/74
Licensee Event Report 99-002-00

Attached please find Licensee Event Report (LER) 50-528/99-002-00 prepared and submitted pursuant to 10 CFR 50.73. This LER reports a condition where emergency diesel generator output breaker relay trip bypasses were not surveilled in accordance with technical specification requirements. The corrective actions being taken as a result of this condition are being controlled in accordance with the PVNGS corrective action program.

There are no commitments made to the NRC by this letter.

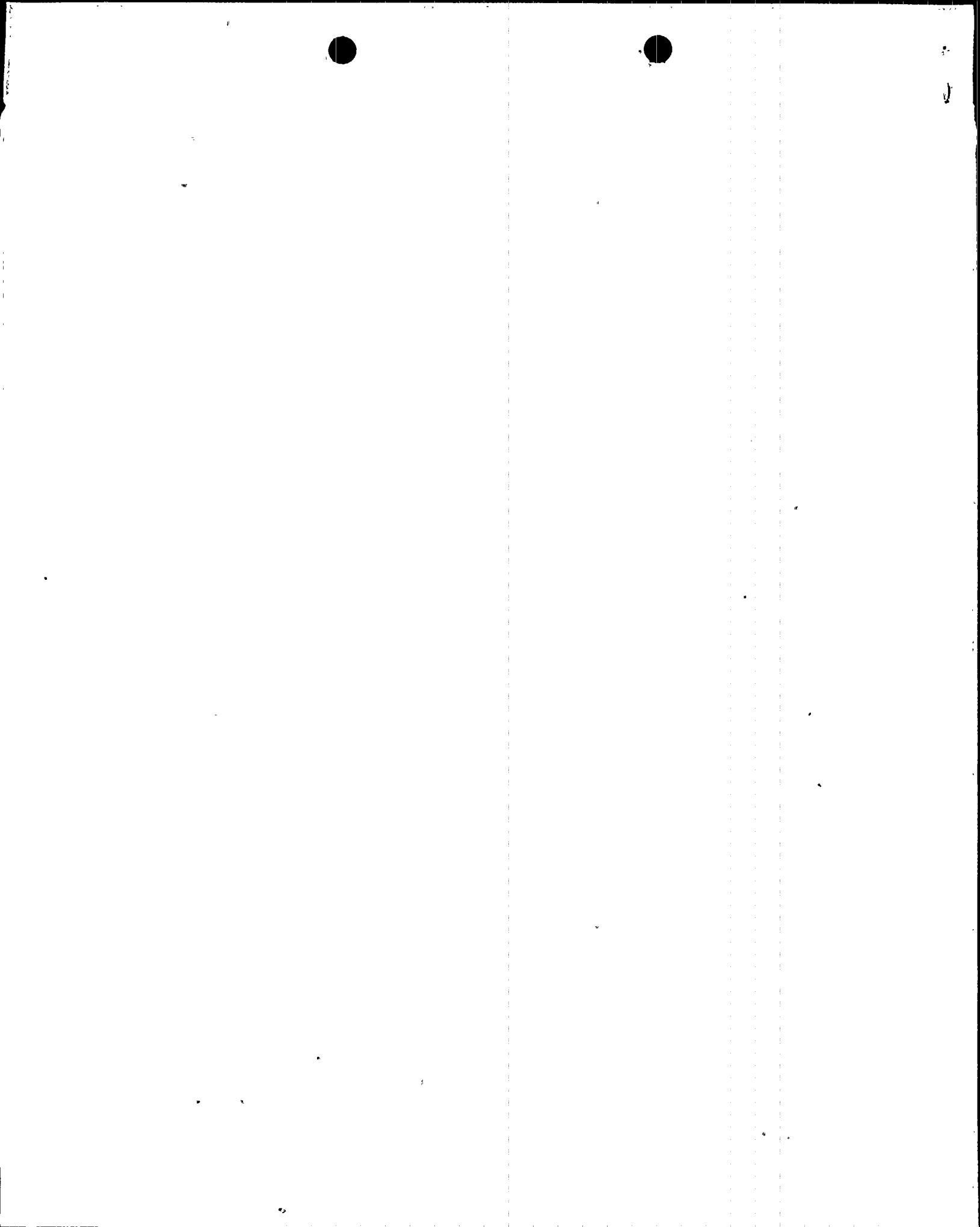
In accordance with 10CFR50.73(d), a copy of this LER is being forwarded to the Regional Administrator, NRC Region IV and the Resident Inspector. If you have questions regarding this submittal, please contact Daniel G. Marks, Section Leader, Regulatory Affairs, at (623) 393-6492.

Sincerely,

WEI/DGM/RAS

Attachment

cc: E. W. Merschoff (all with attachment)
J. H. Moorman
N. Kalyanam
INPO Records Center
9909090236 990827
PDR ADDCK 05000528
S PDR



| NRC FORM 366 (6-1998) | | U.S. NUCLEAR REGULATORY COMMISSION | | APPROVED BY OMB NO. 3150-0104 EXPIRES 06/30/2001 <small>Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-8 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.</small> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FACILITY NAME (1) Palo Verde Nuclear Generating Station-Unit 1 | | | | DOCKET NUMBER (2) 05000528 | | PAGE (3) 1 OF 5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TITLE (4) Test Mode Trip Bypass for Emergency Diesel Generator Output Breakers Not Surveilled | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EVENT DATE (5) <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>MONTH</th> <th>DAY</th> <th>YEAR</th> </tr> <tr> <td>07</td> <td>30</td> <td>1999</td> </tr> </table> | | | MONTH | DAY | YEAR | 07 | 30 | 1999 | LER NUMBER (6) <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>YEAR</th> <th>SEQUENTIAL NUMBER</th> <th>REVISION NUMBER</th> </tr> <tr> <td>1999</td> <td>002</td> <td>00</td> </tr> </table> | | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | 1999 | 002 | 00 | REPORT DATE (7) <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>MONTH</th> <th>DAY</th> <th>YEAR</th> </tr> <tr> <td>08</td> <td>27</td> <td>1999</td> </tr> </table> | | MONTH | DAY | YEAR | 08 | 27 | 1999 | | | | | | | | | | |
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| 08 | 27 | 1999 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OPERATING MODE (9) 1 | | | OTHER FACILITIES INVOLVED (8) <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>FACILITY NAME</th> <th>DOCKET NUMBER</th> </tr> <tr> <td>PVNGS Unit 2</td> <td>05000529</td> </tr> <tr> <td>PVNGS Unit 3</td> <td>05000530</td> </tr> </table> | | | | FACILITY NAME | DOCKET NUMBER | PVNGS Unit 2 | 05000529 | PVNGS Unit 3 | 05000530 | | | | | | | | | | | | | | | | | | | | | | | |
| FACILITY NAME | DOCKET NUMBER | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PVNGS Unit 2 | 05000529 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PVNGS Unit 3 | 05000530 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| POWER LEVEL (10) 100 | | | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11) <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td>20.2201(b)</td> <td>20.2203(a)(2)(v)</td> <td><input checked="" type="checkbox"/></td> <td>50.73(a)(2)(i)</td> <td>50.73(a)(2)(viii)</td> </tr> <tr> <td>20.2203(a)(1)</td> <td>20.2203(a)(3)(i)</td> <td><input type="checkbox"/></td> <td>50.73(a)(2)(ii)</td> <td>50.73(a)(2)(x)</td> </tr> <tr> <td>20.2203(a)(2)(i)</td> <td>20.2203(a)(3)(ii)</td> <td><input type="checkbox"/></td> <td>50.73(a)(2)(iii)</td> <td>73.71</td> </tr> <tr> <td>20.2203(a)(2)(ii)</td> <td>20.2203(a)(4)</td> <td><input type="checkbox"/></td> <td>50.73(a)(2)(iv)</td> <td>OTHER</td> </tr> <tr> <td>20.2203(a)(2)(iii)</td> <td>50.36(c)(1)</td> <td><input type="checkbox"/></td> <td>50.73(a)(2)(v)</td> <td rowspan="2">Specify in Abstract below or in NRC Form 366A</td> </tr> <tr> <td>20.2203(a)(2)(iv)</td> <td>50.36(c)(2)</td> <td><input type="checkbox"/></td> <td>50.73(a)(2)(vii)</td> </tr> </table> | | | | 20.2201(b) | 20.2203(a)(2)(v) | <input checked="" type="checkbox"/> | 50.73(a)(2)(i) | 50.73(a)(2)(viii) | 20.2203(a)(1) | 20.2203(a)(3)(i) | <input type="checkbox"/> | 50.73(a)(2)(ii) | 50.73(a)(2)(x) | 20.2203(a)(2)(i) | 20.2203(a)(3)(ii) | <input type="checkbox"/> | 50.73(a)(2)(iii) | 73.71 | 20.2203(a)(2)(ii) | 20.2203(a)(4) | <input type="checkbox"/> | 50.73(a)(2)(iv) | OTHER | 20.2203(a)(2)(iii) | 50.36(c)(1) | <input type="checkbox"/> | 50.73(a)(2)(v) | Specify in Abstract below or in NRC Form 366A | 20.2203(a)(2)(iv) | 50.36(c)(2) | <input type="checkbox"/> | 50.73(a)(2)(vii) |
| 20.2201(b) | 20.2203(a)(2)(v) | <input checked="" type="checkbox"/> | 50.73(a)(2)(i) | 50.73(a)(2)(viii) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20.2203(a)(1) | 20.2203(a)(3)(i) | <input type="checkbox"/> | 50.73(a)(2)(ii) | 50.73(a)(2)(x) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20.2203(a)(2)(i) | 20.2203(a)(3)(ii) | <input type="checkbox"/> | 50.73(a)(2)(iii) | 73.71 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20.2203(a)(2)(ii) | 20.2203(a)(4) | <input type="checkbox"/> | 50.73(a)(2)(iv) | OTHER | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20.2203(a)(2)(iii) | 50.36(c)(1) | <input type="checkbox"/> | 50.73(a)(2)(v) | Specify in Abstract below or in NRC Form 366A | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20.2203(a)(2)(iv) | 50.36(c)(2) | <input type="checkbox"/> | 50.73(a)(2)(vii) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| LICENSEE CONTACT FOR THIS LER (12) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| NAME Daniel G. Marks, Section Leader, Nuclear Regulatory Affairs | | | | TELEPHONE NUMBER (Include Area Code) 623-393-6492 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO EPIX | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO EPIX | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| SUPPLEMENTAL REPORT EXPECTED (14) YES (If yes, complete EXPECTED SUBMISSION DATE). <input checked="" type="checkbox"/> NO | | | | | EXPECTED SUBMISSION DATE (15) <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>MONTH</th> <th>DAY</th> <th>YEAR</th> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> </table> | | MONTH | DAY | YEAR | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16) <p>On July 30, 1999, at 1530 MST, Palo Verde Units 1, 2 and 3 were in Mode 1 (POWER OPERATION), operating at approximately 100 percent power when operations personnel entered surveillance requirement (SR) 3.0.3. The SR 3.0.3 entry was based on an engineering assessment that concluded that surveillance test procedures did not verify that emergency diesel generator (EDG) output breaker test mode trips are bypassed during emergency mode of operation of the EDG. The engineering assessment identified that since April 1, 1996, the bypass function of these trips had been verified during testing performed under a maintenance procedure. Prior to April 1, 1996, testing of the EDG output breaker test mode bypass trips had not been performed.</p> <p>A plant review board was convened to review the condition and after examining the six most recent performances of the maintenance testing results (two from each unit), it was determined that surveillance requirements had been met by the maintenance procedure. Prior to April 1, 1996 however, the bypass trips had not been tested in accordance with technical specification requirements. At approximately 1640 MST, on July 30, 1999, operations personnel exited SR 3.0.3 for the missed surveillances.</p> <p>A previous similar event was reported in LER 50-528/97-006-00.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | 1999 | - 002 - | 00 | |

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

1. REPORTING REQUIREMENT(S):

This LER (50-528/99-002-00) is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B) to report an event that resulted in a condition prohibited by the plant's Technical Specifications (TS).

Specifically, prior to April 1, 1996, surveillance testing was not performed to verify that the emergency diesel generator (EDG)(EIIS: EK) output breaker (EIIS: EB, BKR) test mode trips are bypassed during emergency mode operation of the EDG. This surveillance requirement (SR) is currently contained in TS Limiting Condition for Operation (LCO) SR 3.8.1.13, which states: "Verify each DG automatic trip is bypassed on actual or simulated loss of voltage signal on the emergency bus concurrent with an actual or simulated ESF actuation signal except: a. Engine overspeed; b. Generator differential current; c. Engine low lube oil pressure; and d. Manual emergency stop trip." The TS SR in effect prior to April 1, 1996 were similar in wording to the current SR.

2. DESCRIPTION OF STRUCTURE(S), SYSTEM(S) AND COMPONENT(S):

This LER describes a condition where surveillance testing was not performed on contacts of the EDG output breaker control relay 4GEX2/15 (EIIS: RLY). The subject relays are Amerace Corporation, model number GPDR-C740, general purpose, normally deenergized, control relays.

The control circuits for the EDG 4160 volt output breakers include relays AX3 (EIIS: RLY) and 4GEX2/15. Relay AX3 is energized by contacts from non-safety related generator protective relays and changes state during load unbalance, phase overcurrent, or neutral overvoltage conditions. When any of these conditions occur, contacts of relay AX3 close, providing a trip signal through the contacts of the 4GEX2/15 relay to the EDG output breaker. When the EDG is running in the "test mode," relay 4GEX2/15 does not change state (i.e., contacts closed) which allows signals from the AX3 relay contacts to trip the output breaker. Conversely, when the EDG is running in the "emergency mode," relay 4GEX2/15 changes state (i.e., contacts open) and trip signals generated from the AX3 relay are bypassed.

3. INITIAL PLANT CONDITIONS:

On July 30, 1999, at approximately 1530 MST, Palo Verde Units 1, 2 and 3 were in Mode 1 (POWER OPERATION), operating at approximately 100 percent power. There were no structures, systems, or components that were inoperable that contributed to the event.

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4. EVENT DESCRIPTION:

On July 30, 1999, an APS engineer concluded (after reviewing GL 96-01 related industry event reports) that the applicable PVNGS surveillance test procedures did not verify that the test mode trips for the EDG output breaker are bypassed by the emergency run control relays (4GEX2/15). However, the bypass of the test mode trips was being verified under an approved maintenance procedure.

On July 30, 1999, at 1530 MST, Operations personnel in all three Palo Verde units invoked SR 3.0.3 which allows for completion of the surveillance test within 24 hours. A plant review board (PRB) was convened to review the condition and to determine if the surveillance requirement was met by the maintenance test procedure. The PRB examined the six most recent performances of the maintenance procedure (two from each unit) and concluded the surveillance requirement was met. At approximately 1640 MST, on July 30, 1999, unit operations personnel exited SR 3.0.3 for the missed EDG trip surveillances.

On August 18, 1999, Licensing and Compliance personnel concluded that although the maintenance testing of the test mode trip relays currently met the surveillance requirement, the SR had not been satisfied prior to implementation of the maintenance test procedure and was, therefore, reportable as a condition prohibited by TS.

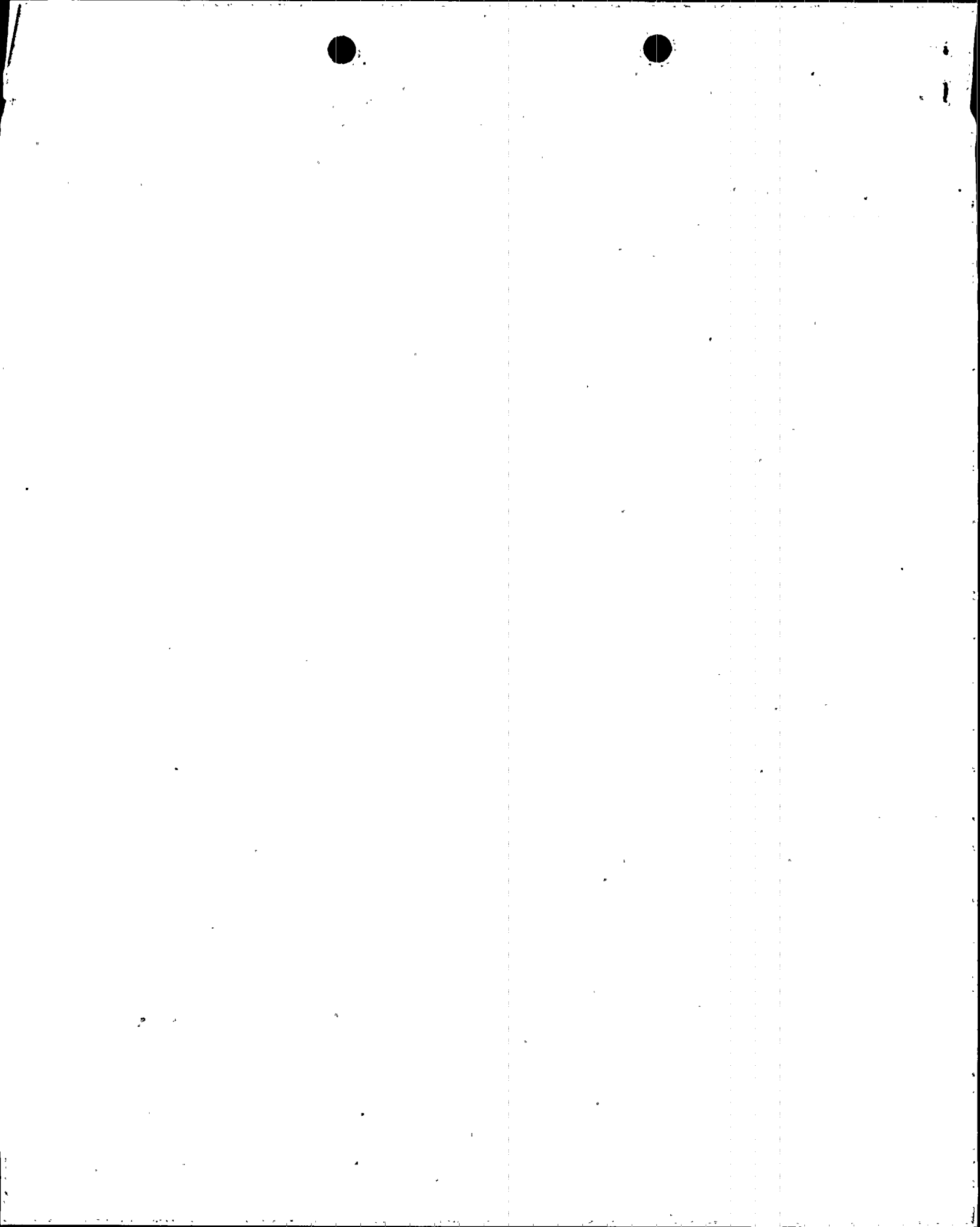
5. ASSESSMENT OF SAFETY CONSEQUENCES:

The bypass function of the test mode trips for the EDG output breaker by the emergency run control relays (4GEX2/15) has been tested since April 1996, at the TS required frequency, demonstrating the relays were capable of performing their intended safety function and there is no evidence to suggest that the relays would have failed to perform their intended safety function in the past.

This event did not adversely affect the safe operation of the plant or health and safety of the public. The event did not result in any challenges to the fission product barriers or result in any releases of radioactive materials. Therefore, there were no adverse safety consequences or implications as a result of the event.

6. CAUSE OF THE EVENT:

An investigation of this event is being conducted in accordance with the PVNGS Condition Reporting program. Preliminary investigation results indicate that prior to April 1996, the EDG surveillance requirements were considered to require verification of EDG trips only, and were not



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related to those trips associated with the output breakers. Since April, 1996, the bypass of the test mode trips for the EDG output breaker were considered important and were being periodically tested under a maintenance test but they were not considered to be within the scope of the TS SR. Based on engineering review of industry reports relating to GL 96-01, the current interpretation of SR.3.8.1.13 should have included the output breaker trip bypasses as part of TS SR. The applicable surveillance test procedures (e.g., 73ST-1DG01, 73ST-2DG01 and 73ST-3DG01) for diesel generator and integrated safeguards surveillance testing will be revised to include the testing of the bypass function of the test mode trip initiating circuits for the EDG output breaker.

Since the testing of the EDG output breaker test mode trip was not identified in the APS original review of GL 96-01, the ongoing investigation will evaluate the adequacy of the initial review.

A supplement to this LER will be submitted following completion of the investigation if information is identified that would significantly change a reader's perception of the course or consequences of the event, or if there are substantial changes in the specified corrective actions.

7. CORRECTIVE ACTIONS AND ACTIONS TO PREVENT RECURRENCE:

Corrective actions:

On July 30, 1999, at 1530 MST, Operations personnel in all three Palo Verde units conservatively invoked SR 3.0.3 for SR 3.8.1.13 to allow for completion of the surveillance test within 24 hours. The plant review board convened and examined the six most recent performances of the maintenance procedure (two from each unit) and determined the surveillance requirement had been met by the testing performed under the maintenance test procedure. At approximately 1640 MST, on July 30, 1999, unit operations personnel exited SR 3.0.3 for the missed EDG trip surveillances.

Actions to prevent recurrence:

The applicable surveillance test procedures (e.g., 73ST-1DG01, 73ST-2DG01 and 73ST-3DG01) for diesel generator and integrated safeguards surveillance testing will be revised to include the testing of the bypass function of the test mode trip initiating circuits for the EDG output breaker. This action will be completed on a unit by unit basis before the next required surveillance performance for each unit.

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8. PREVIOUS SIMILAR EVENTS:

A similar condition was reported by LER 50-528/97-006-00. This previous LER was submitted as a result of findings from the initial GL 96-01 review. One of the corrective actions specified in the previous LER was that reviews of PVNGS protective systems would continue in an effort to determine if other testing discrepancies exist. Although the action that led to the discovery of this event was not attributable to the previous corrective actions, it was the result of continuing efforts to ensure PVNGS has complied with GL 96-01 requirements.

