NRC FORM 366
(7 77)

U. S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT

EXHIBIT A

CONTROL BLOCK: | | | | | | | (1) (PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

0 1 | A R A N O 1 (2) | 0 0 - 0 0 0 0 0 - 0 0 (3) | 4 1 1 1 1 (4) | (5)
LICENSEE CODE | LICENSE NUMBER | LICENSE TYPE | CAT

CON'T 0 1 REPORT SOURCE L (6) 0 5 0 0 0 3 1 3 (7) 0 3 2 4 8 2 (8) 0 4 2 0 8 2 (9)
DOCKET NUMBER | EVENT DATE | REPORT DATE

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

0 2 On 3/24/82 while in power operation at 73% full power, a routine review
0 3 of the Reactor Protective System (RPS) surveillance procedures revealed
0 4 that the Anticipatory Reactor Trip (ART) Main Feedwater Pump (MFP) and
0 5 main turbine tripped bypass setpoints exceeded the Tech. Spec. limits.
0 6 All anticipatory trip channels were affected, however, the bypass modes
0 7 were not in use since the reactor power was above 20% full power. This
0 8 occurrence is reportable per T.S.6.12.3.2(a). The trip modules were
(cont'd on attachment)

0 9 SYSTEM CODE	I A (11)
CAUSE CODE	D (12)
CAUSE SUBCODE	Z (13)
COMPONENT CODE	Z Z Z Z Z Z (14)
COMP. SUBCODE	Z (15)
VALVE SUBCODE	Z (16)

(17) LER/RO REPORT NUMBER: EVENT YEAR 8 2 — SEQUENTIAL REPORT NO. 0 0 7 / OCCURRENCE CODE 0 3 REPORT TYPE L — REVISION NO. 0

ACTION TAKEN	FUTURE ACTION	EFFECT ON PLANT	SHUTDOWN METHOD	HOURS (22)	ATTACHMENT SUBMITTED	NPRD-4 FORM SUB.	PRIME COMP. SUPPLIER	COMPONENT MANUFACTURER
G (18)	Z (19)	Z (20)	Z (21)	0 0 0 0	Y (23)	N (24)	Z (25)	Z 9 9 9 (26)

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)

1 0 The surveillance procedure for Anticipatory Reactor Trip portion of the
1 1 RPS was written in anticipation of approval of the associated Tech. Spec.
1 2 based on wording in the Design Change Package (DCP). Personnel involved
1 3 interpreted that the MFP bypass should occur at 10% decreasing power
1 4 and the main turbine tripped bypass would occur at 20% decreasing power.
(cont'd on attachment)

1 5 FACILITY STATUS E (28) % POWER 0 7 3 (29) OTHER STATUS (30) NA | METHOD OF DISCOVERY A (31) DISCOVERY DESCRIPTION (32) Procedure Review

1 6 ACTIVITY RELEASED Z (33) CONTENT OF RELEASE Z (34) AMOUNT OF ACTIVITY (35) NA | LOCATION OF RELEASE (36) NA

PERSONNEL EXPOSURES
1 7 NUMBER 0 0 0 (37) TYPE Z (38) DESCRIPTION (39) NA

PERSONNEL INJURIES
1 8 NUMBER 0 0 0 (40) DESCRIPTION (41) NA

LOSS OF OR DAMAGE TO FACILITY (43)
1 9 TYPE Z (42) DESCRIPTION NA

PUBLICITY
2 0 ISSUED N (44) DESCRIPTION (45) NA

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LER NO. 50-313/82-007/03L-0 (cont'd)

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (cont'd)

installed during the last refueling outage (in the first quarter of 1981), but the Tech. Spec. change was not approved and issued until November 3, 1981. The safety significance of this specific discrepancy is negligible because the anticipatory trips provide additional protection and conservatism beyond that provided by the original RPS. The original analysis for ARTS indicated that only a 12 PSI pressure increase would result from the time of loss of main feedwater from 100% power to the time of the ART. Lower initial power levels would yield lesser pressure increases. Also the original analysis used <25% power for which ART could be bypassed, so even though this occurrence had the ART resets at greater values than Tech. Specs., they were less than the analysis. Additionally the turbine tripped analysis is bounded by the MFP tripped analysis.

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (cont'd)

The bypasses should reset at 12% increasing power and 22% increasing power respectively. The final approved Tech. Specs. indicated that MFP trip may be bypassed up to 10% Reactor Power and the main turbine trip may be bypassed up to 20% Reactor Power. As a result both bypasses were reset 2% higher than stated in Tech. Specs. The RPS surveillance procedures were changed to reflect new setpoints that ensure compliance with Tech. Specs. Appropriate portions of the procedures were performed to install the new setpoints into the RPS. The fact that the settings were found to be out of compliance with Tech. Specs. indicates an administrative control problem. The cause of this occurrence is inadequate review of procedures to assure that Tech. Spec. changes are incorporated. Recently, a practice has been established whereby, upon receipt of a Tech. Spec. change, action is assigned to assure that procedures are revised to incorporate the Tech. Spec. change.