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United States Nuclear Regulatory Commission
Document Control Desk
Mail Station Pl-137
Washington, D.C. 20555

SUBJECT: DOCKET NO. 50-333
LICENSEE EVENT REPORT: 90-015-01
Procedure Deficiency Causes
Missed Surveillance Test

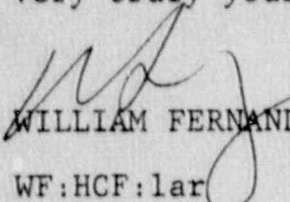
Dear Sir:

This Licensee Event Report was submitted in accordance with 10 CFR 50.73(a)(2)(i)(B) on May 21, 1990.

This revision corrects an error in two dates on the abstract page by changing "5" (May) to "4" (April) which is the month in which the event occurred.

Questions concerning this report may be addressed to Mr. Hamilton Fish at (315) 349-6013.

Very truly yours,


WILLIAM FERNANDEZ

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Enclosure

cc: USNRC, Region I
USNRC Resident Inspector
INPO Records Center
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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1) JAMES A. FITZPATRICK NUCLEAR POWER PLANT	DOCKET NUMBER (2) 0 5 0 0 0 3 3 3	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
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TEXT (If more space is required, use additional NRC Form 388A's) (17)

UPDATED REPORT - ORIGINAL REPORT DATE 5/21/90

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Description

The reactor was shutdown for a refueling outage on March 31, 1990. The movement of fuel within the reactor core for the purpose of refueling was completed at 1140 on April 18, 1990. Preparations began for the replacement of Local Power Range Monitors (LPRMs) [IG]. On April 19, prerequisite checklist (Exhibit 9.1 of Reactor Analyst Procedure, RAP-7.1.4, "LRPM Removal and Installation") was completed and removal of LPRMs started on the midnight to 0800 shift. Five of six LPRMs were replaced on April 19 between 0030 and 2325. At 0145 on April 20, the shift supervisor discovered (by review of the Technical Specifications) that a surveillance test required by Technical Specifications to be performed prior to (and daily during) core alterations had not been performed on April 19.

Technical Specification 4.10.B, "Core Monitoring", states in part, "Prior to making alterations to the core, the SRMs shall be functionally tested and checked for neutron response." Technical Specification 1.0.B defines core alteration as "The act of moving any component within the region above the core support plate, below the upper grid, and within the shroud." Although the replacement of the LPRM strings would not have significant effect on core reactivity, LPRM replacement is technically a core alteration because it falls within the definition of Technical Specification 1.0.B. Accordingly, Surveillance Test ST-5-0, "SRM Functional Test", should have been performed on April 19 prior to LPRM replacement. This test had been performed at 0215 on April 18, 22 hours prior to this event during refueling operations.

Upon discovery of the failure to perform the test on April 20, it was performed and the results were acceptable. The final LPRM was then replaced starting at 0300 with completion at 0535 on April 20.

Cause

The replacement of the LPRMs was performed in accordance with an approved procedure. The prerequisite checklist for this evolution did not include steps for the performance of the surveillance test for the Source Range Monitors (SRMs) [IG]. Therefore, the operators were not alerted to the necessity for performance of the test. The procedure is used only during refueling outages and is therefore reviewed only infrequently. During the last use of the procedure, it happened that the entire reactor core had been off loaded. With no fuel in the core, there was, during the past two refueling outages, no requirement to

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perform checks of the SRMs. Therefore the omission of these steps from the prerequisites of the procedure was not noticed in 1987 and 1988. This omission was not found during the review of the procedure prior to the start of the current outage.

Analysis

This event is reported under the provisions of 10CFR50.73(a)(2)(i)(B) as an operation or condition prohibited by plant Technical Specifications. The performance of the checks of the source range monitor channels on April 18 at 0215 and April 20 at 0222 verified that they operable. Accordingly, the operator would have been alerted to changes in core neutron flux if they had occurred. The removal and installation of the local power range monitor instruments does not change the moderator density nor does it change to any measurable extent the neutron absorption characteristics of the core. Accordingly, no potential for adverse safety consequences was present during this event.

Corrective Action

1. Reactor Analyst Procedure 7.1.4, "LPRM Removal and Installation" will be revised to include prerequisite steps for performance of required SRM surveillance tests. RAP-7.1.23, "Removal of Defective IRM/SRM Instrument Dry Tubes" was revised on April 25 to include similar prerequisite steps.
2. A review of other reactor analyst procedures will be conducted to assure that similar deficiencies are corrected.

Additional Information

LERs 90-007 and 89-008 describe events in which a procedural deficiency resulted in incomplete surveillance testing.