

**TU**ELECTRIC

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August 19, 1994

William J. Cahill, Jr.  
Group Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2  
DOCKET NO. 50-446  
CONDITION PROHIBITED BY THE PLANT'S TECHNICAL SPECIFICATION  
LICENSEE EVENT REPORT 446/94-011-00

Gentlemen:

Enclosed is Licensee Event Report (LER) 94-011-00 for Comanche Peak Steam Electric Station Unit 2, "Personnel Error Resulting in Failure to Satisfy Technical Specification Surveillance Staggered Test Basis Requirement."

Sincerely,

*William J. Cahill, Jr.*  
William J. Cahill, Jr.

By: *Roger D. Walker*  
Roger D. Walker A08  
Regulatory Affairs Manager

ES:tg

ENCLOSURE

cc: Mr. L. J. Callan, Region IV  
Mr. D. N. Graves, Region IV  
Resident Inspectors, CPSES

IF22

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NRC FORM 366		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED OMB NO.3150-0104 EXPIRES: 4/30/92	
<h2 style="margin: 0;">LICENSEE EVENT REPORT (LER)</h2>					
Facility Name (1)				Docket Number (2)	
COMANCHE PEAK-UNIT 2				05000446	
Title (4)				Page (3)	
PERSONNEL ERROR RESULTING IN FAILURE TO SATISFY TECHNICAL SPECIFICATION STAGGERED TEST BASIS REQUIREMENT				1 OF 5	
Event Date (5)		LER Number (6)		Report Date (7)	
Month	Day	Year	Year	Sequential Number	Revision Number
07	22	94	94	011	00
				Month Day Year	
				08 19 94	
Operating Mode (8)		This report is submitted pursuant to the requirements of 10 CFR § (Check one or more of the following) (11)			
1					
Power Level (10)		20.402(b)			
100		20.406(a)(1)(i)			
		20.406(a)(1)(ii)			
		20.406(a)(1)(iii)			
		20.406(a)(1)(iv)			
		20.406(a)(1)(v)			
		20.406(c)			
		50.36(c)(1)			
		50.36(c)(2)			
		50.73(a)(2)(i)			
		50.73(a)(2)(ii)			
		50.73(a)(2)(iii)			
		50.73(a)(2)(iv)			
		50.73(a)(2)(v)			
		50.73(a)(2)(vi)			
		50.73(a)(2)(vii)(A)			
		50.73(a)(2)(vii)(B)			
		50.73(a)(2)(ix)			
		73.71(b)			
		73.71(c)			
		Other (Specify in Abstract below and in Text, NRC Form 366A)			
Name				Area Code Telephone Number	
R. Flores, Shift Operations Manager				817-897-5560	
Complete One Line For Each Component Failure Described in This Report (13)					
Cause	System	Component	Manufacturer	Reportable To NPRDS	
Supplemental Report Expected (14)					Expected Submission Date (15)
<input type="checkbox"/> Yes (if yes, complete Expected Submission Date)					Month Day Year
<input checked="" type="checkbox"/> No					
Abstract (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)					
<p>On July 22, 1994, a surveillance test coordinator discovered that Technical Specification surveillance testing of the Solid State Logic Protection System had not satisfied the staggered test basis requirement. Early testing of one train and subsequent postponement of testing the alternate train resulted in testing of the alternate train at a subinterval which exceeded the specified subinterval plus maximum allowable extension. The event was caused by personnel error during test scheduling. Immediate corrective action was taken and satisfactory performance of the surveillance was accomplished on July 22, 1994. Personnel involved were counselled as to their responsibilities in scheduling staggered test basis surveillances.</p>					

**LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC. 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC. 20503.

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Text (if more space is required, use additional NRC Form 306A's) (17)

**I. DESCRIPTION OF THE REPORTABLE EVENT****A. REPORTABLE EVENT CLASSIFICATION**

Any operation prohibited by Technical Specifications.

**B. PLANT OPERATING CONDITIONS BEFORE THE EVENT**

On July 22, 1994, CDT (discovery date) Comanche Peak Steam Electric Station (CPSES) Unit 2 was in Mode 1, power operation with the Reactor Coolant System at normal operating temperature and pressure.

**C. STATUS OF STRUCTURES, SYSTEMS, OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT**

There were no inoperable structures, systems, or components that contributed to the event.

**D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES**

Technical Specification 4.3.1.1 requires that each train of Solid State Protection System (SSPS) logic be demonstrated operable at least once per 62 days on a staggered test basis. Since there are two trains of SSPS, the subinterval for the stagger is 31 days plus a grace period of 16 days, making a maximum allowable time between tests of 47 days.

Train A of SSPS was tested on May 15, 1994. Train B had originally been scheduled to be tested on June 15, 1994 thus making the next required time for the Train A test to be July 15, 1994. This plus the allowable grace period for the activity made July 31, 1994 the violation date for the next Train A test. This violation date was what was printed on the work package prepared for performing the test. Subsequent to the May 15, 1994 Train A test however, the Train B test was performed early on June 1, 1994 due to scheduling considerations. This then made the next Train A test date to be July 1, 1994 and the violation date to be July 17, 1994. The new violation date was not updated on the work package and when the scheduled test date arrived, a management decision was made (based on the old violation date) to postpone the test.

# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

At approximately 9:00 a.m., on July 22, 1994, a surveillance test coordinator (utility, non-licensed) while reviewing surveillance activities discovered that the surveillance on the SSPS Train A logic had not been performed in accordance with its staggered test basis requirement.

The control room was notified and the test was completed satisfactorily at 2:28 p.m. on July 22, 1994, CDT.

## E. THE METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE, OR PROCEDURAL OR PERSONNEL ERROR

While performing a review of surveillance activities a surveillance test coordinator noted that testing of the Solid State Logic Protection System had not been performed such that the staggered test basis subinterval, including the maximum allowable extension, had been satisfied.

## II. COMPONENT OR SYSTEM FAILURES

### A. FAILED COMPONENT INFORMATION

Not applicable - there were no component failures associated with this event.

### B. FAILURE MODE, MECHANISM, AND EFFECT OF EACH FAILED COMPONENT

Not applicable - there were no component failures associated with this event.

### C. CAUSE OF EACH COMPONENT OR SYSTEM FAILURE

Not applicable - there were no component failures associated with this event.

### D. SYSTEMS OR SECONDARY FUNCTIONS THAT WERE AFFECTED BY FAILURE OF COMPONENTS WITH MULTIPLE FUNCTIONS

Not applicable - there were no component failures associated with this event.

# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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## III. ANALYSIS OF THE EVENT

### A. SAFETY SYSTEM RESPONSES THAT OCCURRED

Not applicable - there were no safety system responses associated with this event.

### B. DURATION OF SAFETY SYSTEM TRAIN INOPERABILITY

Not applicable - there were no safety systems rendered inoperable due to a failure.

### C. SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT

The Solid State Logic Protection System takes input from the process and nuclear instrument channels corresponding to conditions of plant parameters. The system combines these signals in the required logic combination and generates a trip signal (no voltage) to the undervoltage coils of the reactor trip circuit breakers when the necessary combination of signals occur. Failure to perform the testing on a staggered interval increases the length of time a common cause system failure may go undetected. The successful testing of the subject system demonstrates it was at all times capable of performing its intended safety function of providing a reactor trip signal when appropriate. The short term failure to satisfy the staggered test basis requirements for these surveillances did not adversely affect the safe operation of CPSES Unit 2 or the health and safety of the public.

## IV. CAUSE OF THE EVENT

The surveillance test coordinator did not update the violation date on the surveillance test work package when it required changing due to the early performance of the alternate train testing.

## V. CORRECTIVE ACTIONS

### IMMEDIATE

Compliance with the staggered test basis requirement was restored by rescheduling and performing the surveillance testing of the affected equipment.

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## ACTIONS TO PREVENT RECURRENCE

Personnel involved with scheduling within the responsible work group were counselled on the need to be pro-active in updating staggered test basis surveillances as necessary.

## VI. PREVIOUS SIMILAR EVENTS

Two events (LERs 50-445/90-024-00 and 50-445/91-017-00) describe similar events which have occurred four and three years ago respectively. TU Electric has reviewed the causes of the previous events and have found that the corrective actions for the previous events have been generally effective.