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October 27, 1994

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Technical Specifications Violation Due to Missed
Surveillance
LER 94-009-00

GNRO-94/00128

Gentlemen:

Attached is Licensee Event Report (LER) 94-009-00 which is a final report.

Yours truly,

CRH
CRH/JEO/
attachment

cc:

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NRC FORM 366 (5-92)		U.S. NUCLEAR REGULATORY COMMISSION				APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95				
LICENSEE EVENT REPORT (LER)						ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), 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				
FACILITY NAME (1) Grand Gulf Nuclear Station						DOCKET NUMBER (2) 05000-416		PAGE (3) 01 of 03		
Technical Specification Violation Due to Missed Surveillance										
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 NAME	DOCKET NUMBER
09	29	94	94	009	00	10	27	94	N/A	05000
									FACILITY NAME	DOCKET NUMBER
									N/A	05000
OPERATING MODE (3)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more (11))								
1		20.402(b)				20.405(c)		50.73(a)(2)(iv)		73.71(b)
POWER LEVEL (10)		20.405(a)(1)(i)				50.36(c)(1)		50.73(a)(2)(v)		73.71(c)
100		20.405(a)(1)(ii)				50.36(c)(2)		50.73(a)(2)(vii)		OTHER
		20.405(a)(1)(iii)		X		50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in abstract below and in text, NRC Form 366A)
		20.405(a)(1)(iv)				50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)		
		20.405(a)(1)(v)				50.73(a)(2)(iii)		50.73(a)(2)(x)		
LICENSEE CONTACT FOR THIS LER (12)										
NAME James Owens / Licensing Specialist						TELEPHONE NUMBER (Include Area Code) 601-437-6483				
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS
SUPPLEMENTAL REPORT EXPECTED (14)						EXPECTED		MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)		X		NO		SUBMISSION DATE (15)				
ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single spaced typewritten lines) (16)										
<p>On September 29, 1994, while conducting a review of the Logic System Functional Test (LSFT) surveillance procedures, a deficiency was discovered. The LSFT review revealed that surveillance procedure 06-OP-1E12-R-0023 which should have verified a portion of the Containment Spray high drywell pressure initiation logic, failed to properly demonstrate the condition of the "B" train contacts (T1-M1) for logic relay 1E12K6. This resulted in a violation of Technical Specification (TS) 4.3.8.2 which requires an LSFT be performed on an eighteen month frequency. Since it cannot be ensured that the procedure as written, would meet the intent of the TS surveillance requirement, credit cannot be taken for this contact being tested.</p> <p>Upon discovery of this condition, the requirements of TS applicability 4.0.3 were initiated and the contacts successfully tested. Additionally, a deficiency report and procedure change was initiated.</p> <p>The test which was in place did test the redundant parallel contacts in the high drywell pressure initiation logic. Therefore "B" train of Containment Spray would have performed its design function.</p>										

NRC FORM 366A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95	
<p align="center">LICENSEE EVENT REPORT (LER) TEXT CONTINUATION</p>		<p>ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), 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</p>	
		FACILITY NAME (1) Grand Gulf Nuclear Station	DOCKET NUMBER (2) 05000-416

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

A. Reportable Occurrence

On September 29, 1994 an ongoing review of LSFT procedural overlap in preparation for implementation of Improved Technical Specifications for GGNS, revealed a LSFT overlap deficiency between surveillance procedures 06-OP-1E12-R-0023 and 06-IC-1B21-Q-2008. The review indicated that a set of contacts in the "B" Containment Spray train high drywell pressure initiation logic could not be verified as having been adequately tested. Steps contained in 06-OP-1E12-R-0023 were adequate for testing three of the four sets of contacts, but contacts for 1E12K6 (T1-M1) were not properly tested by this procedure or 06-IC-1B21-Q-2008. This was in violation of GGNS TS 4.3.8.2 which required the entire system logic to be tested on an eighteen month frequency.

B. Initial Condition

At the time of discovery, the reactor was in OPERATIONAL CONDITION 1 with reactor power at 100 percent, temperature of 530 F, and pressure of 1034 psig.

C. Description of Occurrence

During a review of LSFT surveillance procedures, a discrepancy in testing of the Containment Spray initiation logic was revealed. One of the four sets of contacts in the high drywell pressure circuit of the Containment Spray initiation logic was not adequately tested. As written, the procedure that tested the "A" train and the other set of contacts in the "B" train, (06-OP-1E12-R-0023), failed to provide verification for the 1E12K6 (T1-M1) contacts. Since the deficiency in procedure 06-OP-1E12-R-0023 was not compensated by overlap of procedure 06-IC-1B21-Q-2008, it could not be verified that 1E12K6 (T1-M1) contacts had been adequately tested. Therefore the plant had been in violation of TS 4.3.8.2. However, 06-IC-1B21-Q-2008 does verify three other sets of contacts from the 1E12K6 relay. This provides assurance that 1E12K6 would have functioned properly.

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D. Apparent Cause

Investigation indicates that this condition was the result of a procedural inadequacy. The procedure successfully tested the "A" train and one of the two sets of contacts on the "B" train. However, due to a difference in logic in the "B" train, a procedural step that required holding the manual initiation push button while introducing the trip signal, prevented verification of the 1E12K6 (T1-M1) contacts. As a result of holding the manual initiation push button, the bulb used to verify the contacts was powered independent of the condition of the contacts. This set of contacts was not tested by another procedure. Therefore, GGNS was in violation of TS 4.3.8.2.

E. Corrective Actions

A quality deficiency report (QDR # 0243-94) was written to address the procedural deficiency. As a result of this QDR, a revision was written to correct the procedure. The requirements of TS 4.0.3 were initiated and the 1E12K6 (T1-M1) contacts were successfully tested.

This deficiency was discovered as part of an ongoing detailed LSFT review under way in preparation for implementation of the Improved TS for GGNS. If any other LSFT procedural discrepancies are identified during this review, they will be submitted at the conclusion of the LSFT review as an addendum to this report.

F. Safety Assessment

No adverse affects resulted from the inability to properly verify the condition of the (T1-M1) 1E12K6 contacts. In the event of an actual Containment Spray high drywell pressure initiation signal, the "B" train would have performed as designed due to a set of redundant high drywell pressure initiation contacts parallel to the 1E12K6 (T1-M1) contacts. Additionally, redundancy provided by the "A" train of Containment Spray ensure that there was no loss of safety function as a result of this condition. Therefore, no adverse effect to the health and safety of the general public existed during this deficiency.