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**John G. Cook**  
Vice President

U-602390  
L45-95( 01-13 )LP  
2C.220  
JGC-018-95  
January 13, 1995  
10CFR50.73

Docket No. 50-461

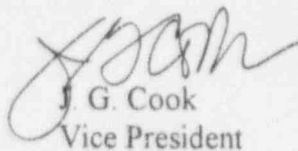
Document Control Desk  
Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Clinton Power Station - Unit 1  
Licensee Event Report No. 94-009-00

Dear Sir:

Enclosed is Licensee Event Report No. 94-009-00: Oversight by Licensed Operator Results in Failure to Demonstrate Operability of Offsite Alternating Current Power Sources Within One Hour After Declaring the Emergency Diesel Generator Inoperable. This report is being submitted in accordance with the requirements of 10CFR50.73.

Sincerely yours,



J. G. Cook  
Vice President

RSF/csm

Enclosure

cc: NRC Clinton Licensing Project Manager  
NRC Resident Office, V-690  
Regional Administrator, Region III, USNRC  
Illinois Department of Nuclear Safety  
INPO Records Center

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## LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

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 (MNB 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)

Clinton Power Station

DOCKET NUMBER (2)

05000461

PAGE (3)

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TITLE (4) Oversight by Licensed Operator Results in Failure to Demonstrate Operability of Offsite Alternating Current Power Sources Within One Hour After Declaring the Emergency Diesel Generator Inoperable

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
12	20	94	94	009	00	01	13	95	None	05000
									FACILITY NAME	DOCKET NUMBER
									None	
OPERATING MODE (9)		1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)							
			20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)	
POWER LEVEL (10)		100	20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)	
			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

J. A. Neuschwanger, Assistant Director-Plant Operations

TELEPHONE NUMBER (Include Area Code)

(217) 935-8881, Extension 3326

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)

YES

(If yes, complete EXPECTED SUBMISSION DATE).

X

NO

EXPECTED SUBMISSION DATE (15)

MONTH

DAY

YEAR

ABSTRACT (Limit to 1400 characters, i.e., approximately 15 single-spaced typewritten lines) (16)

On December 20, 1994, the plant was in POWER OPERATION at 100 percent reactor power and a planned maintenance outage was scheduled for Division 3 equipment. Due to the scope of the outage work, the Division 3 emergency diesel generator (EDG) and other equipment were declared inoperable at about 0500 hours. With the Division 3 EDG out of service for planned maintenance, action "d" of Technical Specification (TS) 3.8.1.1 requires the operability of the offsite alternating current power sources to be demonstrated by performing TS Surveillance Requirement 4.8.1.1.1a within one hour and at least once per eight hours thereafter. At about 0640 hours, operators realized that the one-hour action had not been completed. The action was completed by 0647 hours with satisfactory results. The TS actions for the other equipment were initiated as required. The cause of this event is attributed to licensed operator error. The operator tracking the implementation of the TS requirements forgot to perform the action within one hour. Corrective action for this event included reviewing the event and discussing the findings with involved personnel, issuing an Operations Night Order containing the shift supervisor's report of the event, and the plant manager discussing the event with the involved shift supervisor.

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

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

**DESCRIPTION OF EVENT**

On December 20, 1994, the plant was in Mode 1 (POWER OPERATION) at about 100 percent reactor [RCT] power and a planned maintenance outage was scheduled to begin for Division 3 equipment. The outage work scope included work on the shutdown service water (SC) system [BI] pump [P], high pressure core spray (HPCS) system [BG] components, and the Division 3 battery [BTRY] and direct current power distribution (DC) system [EJ]. Prior to the start of the outage, operators discussed the impacts of the outage and identified the need to declare the Division 3 emergency diesel generator (EDG) [EK] inoperable although no work was to be performed on this equipment. Operators prepared the required documentation for tracking the equipment that would be removed from service during the outage.

At about 0500 hours, operators declared the HPCS system, Division 3 SX system, Division 3 battery, and Division 3 EDG inoperable and the appropriate Technical Specification actions were initiated in response to the inoperable HPCS, SX, and Division 3 battery systems and components.

Technical Specification 3.8.1.1 requires the Division 3 EDG to be operable when the plant is in Modes 1, 2 (STARTUP), and 3 (HOT SHUTDOWN). As required by action "d" of Technical Specification 3.8.1.1, with the Division 3 EDG out of service for planned maintenance, the operability of the offsite alternating current power sources must be demonstrated by performing Technical Specification Surveillance Requirement 4.8.1.1.1.a within one hour and at least once per eight hours thereafter. Technical Specification Surveillance Requirement 4.8.1.1.1.a requires the two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system to be determined operable by verifying correct breaker alignments and indicated power availability. Technical Specification Surveillance Requirement 4.8.1.1.1.a is implemented by surveillance procedure CPS 9082.01, "Electrical Distribution Verification Mode (sic) 1, 2, and 3."

At about 0640 hours, the "A" reactor operator questioned whether surveillance CPS 9082.01 should be performed since the Division 3 EDG had been declared inoperable at 0500 hours. The line assistant shift supervisor (LASS) immediately realized that the initial performance of the surveillance had not been completed within the one-hour requirement. The LASS immediately directed operators to complete the surveillance, and notified the shift supervisor of the event. The surveillance was completed by 0647 hours and confirmed correct breaker alignments and power availability. Condition report 1-94-12-033 was initiated to track a root cause and corrective action determination for the event.

No automatic or manually initiated safety system responses were necessary to place the plant in a safe and stable condition. No other equipment or components were inoperable at the start of this event to the extent that their inoperable condition contributed to this event.

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

**CAUSE OF EVENT**

The cause of this event is attributed to licensed operator error. In preparation for the outage, the need to declare the Division 3 EDG was recognized and appropriate documentation was initiated for tracking the inoperable equipment. Declaring an emergency diesel generator inoperable is a frequently performed evolution, and the actions required in response to such declaration are known by the Operations staff. When the outage began, the Technical Specification required actions were initiated for the other equipment taken out of service; however, performing surveillance CPS 9082.01 was not an immediate requirement and was not recognized until 40 minutes after the one-hour time limit had expired. The LASS was tracking implementation of Technical Specification requirements but forgot the requirement to perform the breaker alignment and power availability surveillance within one hour. No other Operations crew member had been assigned to provide backup tracking of requirements and the Operations actions in supporting the planned maintenance work had the attention of nearly all the crew, including the shift supervisor.

**CORRECTIVE ACTION**

The shift supervisor conducted a review of this event and discussed the findings with involved main control room personnel. The shift supervisor emphasized the need for attention to detail and for maintaining an awareness of all activities so each crew member can provide backup support to the other crew members to assure applicable requirements are met.

A copy of the shift supervisor's investigation report for this event was attached to the Operations Night Orders to provide all Operations crews the opportunity to review the event and the results of the investigation.

The plant manager discussed this event with the involved shift supervisor, emphasizing the importance of maintaining a broad overview of plant activities and avoiding intimate involvement in specific activities.

**ANALYSIS OF EVENT**

This event is reportable under the provisions of 10CFR50.73(a)(2)(i)(B) because of the failure to complete action "d" of Technical Specification 3.8.1.1 within one hour after declaring the Division 3 EDG inoperable.

Assessment of the safety consequences and implications of this event indicates that this event was not nuclear safety significant. This assessment was based on the completion of Technical Specification Surveillance Requirement 4.8.1.1.1.a with satisfactory results at 0647 hours on December 20, 1994.

The provisions of action "d" of Technical Specification 3.8.1.1 were not met from 0600 hours to 0647 hours on December 20, 1994.

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

**ADDITIONAL INFORMATION**

No equipment or components failed as a result of this event.

Illinois Power has not reported similar failures to complete Technical Specification actions in recent history.

For further information regarding this event, contact J. A. Neuschwanger, Assistant Director-Plant Operations at (217) 935-8881, extension 3326.