



PEACH BOTTOM—THE POWER OF EXCELLENCE

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION

R. D. 1, Box 208
Delta, Pennsylvania 17314

(717) 456-7014

June 19, 1991

Docket Nos. 50-277
50-278

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

SUBJECT: Licensee Event Report
Peach Bottom Atomic Power Station - Unit 2

This LER concerns a Technical Specification violation as a result of a missed Surveillance Test due to Programmatic Weaknesses.

Reference:	Docket Nos. 50-277 50-278
Report Number:	2-91-016
Revision Number:	00
Event Date:	05/17/91
Report Date:	06/19/91
Facility:	Peach Bottom Atomic Power Station RD 1, Box 208, Delta, PA 17314

This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B).

Sincerely,

cc: J. J. Lyash, USNRC Senior Resident Inspector
T. T. Martin, USNRC, Region I

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Peach Bottom Atomic Power Station - Unit 2 and 3										DOCKET NUMBER (2) 0 5 0 0 0 2 7 7 1 OF 0 4										PAGE (3) 1 OF 0 4																													
TITLE (4) Technical Specification Violation as a Result of a Missed Surveillance Test due to Programmatic Weaknesses																																																	
EVENT DATE (5) 0 5 1 7 9 1 9 1										LER NUMBER (6) 0 1 6 0 0										REPORT DATE (7) 0 6 1 9 9 1										OTHER FACILITIES INVOLVED (8) Peach Bottom - Unit 3 0 5 0 0 0 2 7 8																			
OPERATING MODE (9) N										THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)																																							
POWER LEVEL (10) 0 0 0										20.402(a)										20.405(a)										50.73(a)(2)(i)										73.71(b)									
										20.405(a)(1)(i)										50.36(a)(1)										50.73(a)(2)(ii)										73.71(c)									
										20.405(a)(1)(ii)										50.36(a)(2)										50.73(a)(2)(iii)										OTHER (Specify in Section 366A)									
										20.405(a)(1)(iii)										X 50.73(a)(2)(iv)										50.73(a)(2)(v)(A)																			
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LICENSEE CONTACT FOR THIS LER (12)																																																	
NAME Albert A. Fulvio, Regulatory Engineer																				TELEPHONE NUMBER 7 1 7 4 5 6 - 4 9 5 0																													
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																																																	
CAUSE										SYSTEM										COMPONENT										MANUFACTURER										REPORTABLE TO NRC									
SUPPLEMENTAL REPORT EXPECTED (14)																														EXPECTED SUBMISSION DATE (15)										MONTH DAY YEAR									
YES (If yes, complete EXPECTED SUBMISSION DATE)																				X NO																													

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On 5/17/91 for Unit 2 and 5/24/91 for Unit 3, a Technical Specification violation occurred when the mode switches were placed in the STARTUP mode with the Reactor Water Level Instrument Perturbation Surveillance Tests (ST) being out of surveillance. When identified that the STs were out of surveillance, the tests were immediately completed satisfactorily. The cause of this event has been attributed to the inadequacy of the STs and processes which ensure that these tests are completed prior to placing the mode switch in STARTUP. Several programmatic and procedural enhancements will be incorporated. No actual safety consequences occurred as a result of this event. There have been several previous similar LERs involving missed STs. The corrective actions taken as a result of these LERs addressed the specific causes only. Although this event is also specific in nature, a Task Force is presently evaluating the issue of missed STs and will provide recommendations regarding ST performance, scheduling, and tracking.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104
EXPIRES 8/31/88

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		0 1 6	0 0				

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

Requirements for the Report

This report is being submitted to satisfy the requirements of 10 CFR 50.73 (a)(2)(i)(B) due to a Reactor Water Level monthly Surveillance Test (ST) not being performed when required by Technical Specifications.

Unit Conditions at Time of Discovery

Unit 2 and 3 were in the REFUEL mode. There were no other systems, structures, or components that were inoperable that contributed to the event.

Description of Event

On 4/12/91 and 5/17/91 for Unit 2 and 5/24/91 for Unit 3, a Technical Specification violation occurred when the mode switches were placed in the STARTUP mode with the Reactor Water Level Instrument (ELIS:11) Perturbation Surveillance Tests (ST) being out of surveillance.

On 2/1/91, the Reactor Water Level Instrument Perturbation ST was listed on the omitted ST Report since Unit 2 was shutdown and the ST performance was not required until the plant is in the STARTUP or RUN mode. On this report, the ST reason for deletion was listed as "perform prior to startup". On 4/11/91, the ST was placed on the Startup Testing Review Form and coded as "Required during power ascension". On 4/12/91, the Unit 2 mode switch was then placed in the STARTUP mode with the ST being out of surveillance. On 5/3/91, Unit 2 was shutdown for maintenance. On 5/7/91, the ST was again placed on the ST Report as omitted with the listed reason of "perform during startup". The ST was issued to the Operations Department on 5/17/91 as part of the Startup Test Package. On 5/17/91, the Unit 2 mode switch was then placed in the STARTUP mode with the ST being out of surveillance. When identified on 5/20/91 that the test was out of surveillance, the ST was immediately completed satisfactorily.

When investigating this event, a very similar sequence of events also occurred on Unit 3. On 5/3/91, the same Unit 3 ST was listed on the omitted ST Report since Unit 3 was shutdown and the ST performance was not required until the plant is in the STARTUP or RUN mode. On this report, the ST reason for deletion was listed as "perform during startup". On 5/19/91, Shift Management was notified that the ST would be out of surveillance after that day. Several unsuccessful attempts were made to perform the ST due to Plant conditions. On 5/24/91, the Unit 3 mode switch was then placed in the STARTUP mode with the ST being out of surveillance. When identified on 5/24/91 that the test was out of surveillance, the ST was immediately completed satisfactorily.

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

Cause of the Event

The cause of this event has been attributed to the following:

The ST presently verifies several Tech Spec and non-Tech Spec required instruments which makes test performance more difficult due to plant conditions. ST performances while in the SHUTDOWN mode was considered several times but some non-Tech Spec instruments verified on the ST were out of service.

Shift Management (Utility, Licensed) failed to properly review the Surveillance Test Report or the Startup Test Review Form prior to commencing the startup.

Additionally, the ST performances were deferred during shutdown condition with the listed reason of "Perform during startup" instead of "perform prior to startup".

Analysis of Event

No actual safety consequences occurred as a result of this event. The effect has been considered minimal due to the fact that the STs were completed with satisfactory results.

Corrective Actions

The ST's have been completed satisfactorily on 5/20/91 for Unit 2 and on 5/24/91 for Unit 3.

GP-2, "Normal Plant Start-up" will be enhanced to require Shift Management to review the Surveillance Test Report and to ensure that the STs are completed prior to moving the mode switch to the STARTUP mode.

The STs will be revised to specify that the ST is required in the STARTUP and RUN modes. The ST will also be reviewed to consider breaking apart the Reactor Protection System (RPS) and Non-RPS portions into separate tests, this will make test performance easier to be completed.

The event has also been discussed with the involved individuals with appropriate actions taken.

Additionally, the Operations ST Coordinator will list similar STs on the Surveillance Test Review Form with "required prior to startup" if the ST was deferred when in the REFUEL or SHUTDOWN mode.

A Task Force, which was established due to previous missed STs, is presently evaluating the issue of missed STs and will provide recommendations regarding ST performance, scheduling, and tracking.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES 8/31/88

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

Previous Similar Events

There have been several previous similar LERs involving missed STs. The corrective actions taken as a result of these LERs addressed the specific causes only. Although this event is also specific in nature, a Task Force is presently evaluating the issue of missed STs and will provide recommendations regarding ST performance, scheduling, and tracking.