



ENTERGY

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February 17, 1995

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Vice President

Operations

Grand Gulf Nuclear Station

US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 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 94-009-01

GNRO-95/00021

Gentlemen:

Attached is Licensee Event Report (LER) 94-009-01 which is a final report.

Yours truly,

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)												REDUCED 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 04					
TITLE (4) Technical Specifications 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										
01	18	95	94	009	01	02	17	95	N/A				05000										
										FACILITY NAME				DOCKET NUMBER									
										N/A				05000									
OPERATING MODE (9)		1		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more (11))																			
POWER LEVEL (10)		100		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)							
				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) Update							
				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 October 27, 1994, Entergy Operations, on behalf of Grand Gulf Nuclear Station (GGNS) informed the NRC of a deficiency discovered during an ongoing review of surveillance procedures in preparation for implementation of GGNS Improved Technical Specifications (TS). This deficiency was the result of a procedural inadequacy which failed to test one of four sets of contacts in the "B" Containment Spray Train high drywell pressure initiation logic. In that submittal a commitment was made to submit any additional deficiencies discovered, during this review as supplements to LER 94-009-00.</p> <p>On January 18, 1995, an additional deficiency was discovered. This deficiency resulted from the failure to verify the Average Power Range Monitor flow biased simulated thermal power-high time constant for all 8 channels on an eighteen month frequency as specified by GGNS Reactor Protection System TS 4.3.1.1. Therefore, this report is being submitted pursuant to 10CFR50.73(a)(2)(i)(B) as supplement 01 to LER 94-009-00.</p> <p>Upon discovery of these conditions, the requirements of TS 4.0.3 were entered and the surveillances were successfully completed. Additionally, deficiency reports were initiated to address these events.</p> <p>The above deficiencies did not adversely impact the performance of systems important to safety. Therefore, the health and safety of the public was not compromised.</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)</p> <p align="center">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	LER NUMBER (6) 94-009-01
TEXT (If more space is required, use additional copies of NRC Form 366A) (17)				
<p>A. Reportable Occurrence</p> <p>GGNS is in the process of implementing Improved Technical Specifications (TS). As part of that implementation, surveillances that fulfill TS requirements are being reviewed for adequacy as well as future compliance. Currently, two deficiencies have been discovered as a result of this review.</p> <p>On October 27, 1994, GGNS informed the NRC of a deficiency (LER 94-009-00), that was the result of one of the four sets of contacts in the "B" Containment Spray [BO] Train high drywell pressure initiation logic not being adequately tested. This was reported pursuant to 10CFR50.73(a)(2)(i)(B).</p> <p>Subsequent review revealed a second deficiency. GGNS TS 4.3.1.1 note (i) requires the Average Power Range Monitor (APRM) [IG] Reactor Protection System (RPS) [JC] flow biased simulated thermal power (FBSTPH) high time constant be verified every 18 months. However, this verification was not performed for all 8 channels within the specified frequency. Therefore, this report is being submitted pursuant to 10CFR50.73(a)(2)(i)(B).</p> <p>B. Initial Conditions</p> <p>At the time of discovery, the reactor was in Operational Condition 1 with reactor power at 100 percent, temperature of 540 F, and pressure of 1040 psig.</p> <p>C. Description of Occurrence</p> <p>The deficiency reported on October 27, 1994, (LER 94-009-00), involved a procedure that did not adequately verify one of the four sets of contacts in the "B" Containment Spray Train high drywell pressure initiation logic.</p> <p>On January 18, 1995, a second deficiency was discovered. GGNS TS 4.3.1.3 specifies that the APRM RPS FBSTPH time response be tested on a 36 month staggered bases (i.e., half the channels every 18 months). Additionally, TS 4.3.1.1 note (i) specifies that verification of the FBSTPH time constant be performed every 18 month. In the course of the ongoing review, it was discovered that the APRM FBSTPH time constant checks were being performed on the same 36 month staggered frequency as the time response instead of the 18 month frequency for all channels as specified by GGNS TS.</p>				

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<p>Upon discovery of the deficiency, the affected channels were declared inoperable and the actions associated with TS 4.0.3 entered. The time constant verifications for APRM channels A, B, C, and D were successfully completed and the channels declared operable. Channels E, F, G, and H had been previously tested in March 1994 and were therefore still in compliance with TS.</p>			
<p>D. Apparent Cause</p>			
<p>For the event reported October 27, 1994, investigation indicated 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 the logic of the "A" and "B" trains, the procedural was written in a manner that did not allow proper verification of the 1E12K6 (T1-M1) contacts.</p>			
<p>On January 18, 1995 a second deficiency was discovered. TS 4.3.1.1 requires a calibration which verifies the time constant on a 18 month frequency. However, it was being performed along with requirements of TS 4.3.1.3, time response test, which is performed on a staggered basis. Apparently, the TS requirement for the 18 month interval was misunderstood, resulting in a time constant verification frequency corresponding to the 36 month frequency of the time response verification. Based on investigations the surveillance has been performed on this schedule since it was originally issued.</p>			
<p>The circumstances that led to these surveillance inadequacies can not be concretely determined due to the time lapse since these surveillances were originally issued in 1982.</p>			
<p>E. Corrective Actions</p>			
<p>These deficiencies were discovered as part of an ongoing review of surveillances in preparation for implementation of Improved TS for GGNS. In order to implement Improved TS, surveillance procedures will be reviewed and revised to ensure compliance with the new TS. The inadequacies noted are being corrected during this revision.</p>			

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<p>F. Safety Assessment</p>			
<p>As stated in the initial LER 94-009 submittal (October 27, 1995), 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</p>			
<p>The second deficiency did not pose an undue risk due to the fact that the APRM RPS FBSTPH trip is used to prevent power excursions upon loss of feedwater heating by initiating a plant trip. Subsequent to the initial fuel cycle, it was demonstrated that the APRM FBSTPH scram function was no longer needed to ensure acceptable critical power ratio results during a loss of feedwater heating. The APRM FBSTPH scram function is not credited by GGNS in any of its safety analyses. Therefore, failure to perform the time constant verification at the proper frequency did not result in increased risk to the general public.</p>			
<p>G. Additional Information</p>			
<p>Energy Industry Identification System (EIIIS) codes are identified in the text within brackets [].</p>			