NRC FORM 366 (5-92) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 5/31/95

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.

LICENSEE EVENT REPORT (LER)

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

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
South Texas Unit 1	05000 498	1 OF 3

TITLE (4) Failure to Meet the Requirements of Technical Specifications Due to Not Performing a Required Surveillance on a Hydrogen Recombiner

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
04	20	95	95	-- 006 --	00	05	22	95		05000
									FACILITY NAME	DOCKET NUMBER 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)
		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	TELEPHONE NUMBER (Include Area Code)
Jairo Pinzon - Staff Engineer	(512) 972-8027

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 SUBMISSION DATE (15)	MONTH	DAY	YEAR
	YES(If yes, complete EXPECTED SUBMISSION DATE).	X NO				

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

On April 20, 1995, Unit 1 was in Mode 1 at 100% power. A reportability review was completed which determined the requirements of Technical Specification 3.6.4.2 were not met due to a failure to perform the surveillance requirements on the Containment Hydrogen Recombiner 1B in July, 1992. On April 19, 1995, while reviewing trending analysis data as part of the station's system health evaluation program, it was determined a required surveillance performed on May 18, 1992, for Hydrogen Recombiner 1B was actually performed on Hydrogen Recombiner 1A. The cause of this occurrence was a failure of the individual performing the surveillance to self-verify the work being performed was on the correct Hydrogen Recombiner. In addition, personnel responsible for verifying the adequacy of the completed surveillance failed to ensure it was performed on the correct Hydrogen Recombiner. As a corrective action, briefings will be held to stress the need for proper identification of components during the performance of activities.

DESCRIPTION OF EVENT:

On April 20, 1995, Unit 1 was in Mode 1 at 100% power. On April 19, 1995, while reviewing trending analysis data as part of the station's system health evaluation program, it was determined that on May 18, 1992, credit for a completed surveillance was given to Hydrogen Recombiner 1B. Based on review of available information, it was concluded the test was performed on Hydrogen Recombiner 1A instead. No information could be found to substantiate the performance of the required testing for Hydrogen Recombiner 1B. The surveillance interval, including the allowed grace period, expired on July 6, 1992. A reportability review was completed which determined the requirements of Technical Specification 3.6.4.2 were not met due to a failure to perform surveillance requirements on Containment Hydrogen Recombiner 1B. This occurrence constituted a failure to perform a surveillance within the allowed surveillance interval as defined by Technical Specifications.

Hydrogen Recombiner 1B was technically inoperable from July 6, 1992, until the next successful performance of the surveillance which was completed on December 8, 1992. However, the recombiner was required to be operable only through September 19, 1992, at which time a shutdown was completed for a refueling outage. During the entire time, Hydrogen Recombiner 1B was functional, as demonstrated by the successful performance of the surveillance completed on December 8, 1992.

This condition was determined to be reportable on April 20, 1995, as a failure to perform a surveillance required by Technical Specification 3.6.4.2. The Nuclear Regulatory Commission was notified on April 21, 1995, at 1301 hours.

CAUSE OF EVENT:

The cause of this occurrence was a failure of the individual performing the surveillance to self-verify that the work was performed on the correct Hydrogen Recombiner. In addition, personnel responsible for verifying the adequacy of the completed surveillance failed to identify the surveillance had been performed on the incorrect Hydrogen Recombiner.

ANALYSIS OF EVENT:

This occurrence constituted a failure to perform the required surveillance for the Containment System Hydrogen Recombiner 1B within the required Technical Specification time interval. This resulted in Hydrogen Recombiner 1B being technically inoperable, but functional, starting on July 6, 1992. The Limiting Condition for operations as specified by Technical Specification 3.6.4.2 were not met from that date until September, 1992, when Unit 1 completed a shutdown for a refueling outage. This occurrence constituted an operation prohibited by Technical Specifications and is reportable pursuant to 10CFR50.73(a)(2)(i)(B). During the time period when the Hydrogen Recombiner was technically inoperable, it was still functional and capable of performing its intended safety function as demonstrated by the subsequent surveillance performed on December 8, 1992. The health and safety of the public was not threatened as a result of this occurrence.

CORRECTIVE ACTIONS:

The lessons learned from this occurrence will be provided during briefings stressing the need for proper identification of components during performance of any activities. This action will be completed by June 28, 1995.

In addition, the Containment Hydrogen Recombiner System Functional Test was revised as part of the Surveillance Procedure Enhancement Program. Improvements included providing more positive control of component identification when performing surveillances. This revision was effective August 29, 1994.

ADDITIONAL INFORMATION:

There have been several Licensee Event Reports submitted to the Nuclear Regulatory Commission regarding missed surveillances; however, none were due to the performance of the surveillance on the wrong component.