

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)

Brunswick Steam Electric Plant, Unit 1

DOCKET NUMBER (2)

05000325

PAGE (3)

1 of 4

TITLE (4)

SURVEILLANCE TRACKING SYSTEM WAS NOT UPDATED TO REFLECT MOVING REQUIREMENT TO A NEW PROCEDURE

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
5	12	95	95	- 09 -	00	6	11	95	BSEP Unit 2	05000324
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9)	4	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following)(11)							
POWER LEVEL (10)	0%	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 and Text)	
		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

Glen M. Thearling, Regulatory Affairs Specialist

TELEPHONE NUMBER

(910) 457-2038

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

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

On May 12, 1995, while reviewing Operations procedures to assure that Technical Specification surveillance requirements were current prior to startup of Unit 1, it was identified that Periodic Test (PT) 08.1.3d, LPCI/RHR LOOP CROSSTIE VALVE VERIFICATION, had not been completed on either unit since its effective date of December 28, 1993. This is a monthly test which verifies the Residual Heat Removal (RHR) system crosstie valve E11-F010 is shut and de-energized in accordance with Technical Specifications 4.5.3.2.a.3.

Prior to December 28, 1993, verification of the crosstie valve was accomplished by monthly PTs-08.1.3a & b, LPCI/RHR SYSTEM COMPONENT TEST-LOOP A (B). This required multiple entries into a contaminated area resulting in higher personnel dose and radwaste. PT-08.1.3d was developed to reduce radiation dose and radwaste by eliminating the duplication of the crosstie valve surveillance. When the new PT was written and the current PTs were revised to delete the valve testing requirement for verifying the valve position, the Surveillance Test Scheduling System (STSS) was not updated in accordance with administrative procedures. Therefore, when STSS provided scheduling of Technical Specification required surveillances, it did not schedule PT-08.1.3d. STSS still indicated that PTs-08.1.3a & b met the Technical Specification requirements for testing the crosstie valve.

The cause classification for this event per the criteria of NUREG-1022 is Management/Quality Assurance Deficiency.

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Brunswick Steam Electric Plant Unit 1	05000325	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 of 4
		95	- 09 -	00	

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

TITLE

SURVEILLANCE TRACKING SYSTEM WAS NOT UPDATED TO REFLECT MOVING REQUIREMENT TO A NEW PROCEDURE

INITIAL CONDITIONS

Unit 1 was in COLD SHUTDOWN making preparations for startup following a refueling outage and Unit 2 was operating at 100% power. A review of Operations' procedures was being performed to assure that Technical Specification surveillance requirements had been met to support the startup.

EVENT NARRATIVE

Controls for implementing procedure revisions and the development of new procedures were addressed in Volume 1, Book 1 of the Plant Operating Manual. Administrative controls contained in this procedure directed Document Control to route change forms affecting various databases to the proper organization when they received the procedure change package for distribution and filing. The Surveillance Test Scheduling System (STSS) change form (FORM 9) was one of these forms and was routed to Regulatory Affairs to maintain the STSS database.

PT-08.1.3a (b), LPCI/RHR SYSTEM COMPONENT TEST-LOOP A (B) were used to verify various Technical Specification requirements on the "A" and "B" loops of Low Pressure Coolant Injection/Residual Heat Removal (LPCI/RHR) on a monthly basis. Included in both PTs was a check of the LPCI/RHR crosstie valve to verify it was locked closed with power removed.

On June 30, 1993, Administrative Procedure (AP)-003, Rev. 0, Procedure Preparation, Review, and Approval, was approved with an effective date of October 4, 1993. This procedure was developed to improve the administrative process for procedure development and revisions and was part of a complete rewrite of administrative procedure controls (AP-02 through AP-07). One of the changes incorporated in this procedure required the procedure writers to route forms to the proper organization instead of Document Control. One of these forms (FORM AP-003-5) replaced the old FORM 9 which identified required changes to the STSS database.

Between July 1 and October 4, training was provided by the Administration group to site personnel in scheduled classes and on an "as-requested" basis. This training included an overview, the procedure revision flow cycle, and examples of the new forms. Included in the flow cycle is a block which states: "PROCESS FORMS PER OAP-003: Writer", indicating that it was now the responsibility of the procedure writer to forward applicable forms to the appropriate organizations.

On December 21, 1993, PT-08.1.3d, Rev. 0, LPCI-RHR LOOP CROSSTIE VALVE VERIFICATION, was approved with an effective date of December 28, 1993. The procedure writer sent the entire work package to Document Control without sending FORM AP-003-5 to the STSS coordinator..

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FACILITY NAME (1)	DOC(RET) NUMBER (2)	LER NUMBER (6)			PAGE (3)
Brunswick Steam Electric Plant Unit 1	05000325	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 of 4
		95	- 09 -	00	

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On December 9, 1993, Revision 1 to AP-003 was approved with an implementation date of January 4, 1994. This revision returned the form distribution responsibilities to Document Control based on concerns identified with the Revision 0 process.

On May 12, 1995, a review of Operations PTs identified that PT-08.1.3d was not on the STSS database and that it had not been performed on either Unit 1 or Unit 2 since its origination. The PT was immediately performed on both units to meet Technical Specification requirements. Both valves were found to be shut with the power secured as required by Technical Specifications.

This event is being reported in accordance with 10CFR50.73(a)(2)(i) as a condition prohibited by Technical Specifications.

CAUSE OF EVENT

Adequate training was not performed to support a change to the administrative procedure revision process. A complete rewrite of administrative procedure controls was being performed during this period to improve efficiency and streamline the procedure development and revision process. Between the approval date (6/30/93) and the effective date (10/4/93), training was conducted on the major improvements, new forms, and the flowpath for procedure changes. Training did not stress that a process change had been made by the revision requiring that the procedure writer now route the forms instead of Document Control. Also, attendance was "as desired". Procedural controls in place at this time did not designate required training for procedural changes. During the period that Revision 0 was in affect, additional procedure revision forms to update STSS were found to be improperly routed by Operations, Maintenance, and Engineering procedure writers; however, no other example of missing Technical Specifications requirements was identified.

CORRECTIVE ACTIONS

1. PT-08.1.3d was successfully performed on both units when the condition was identified.
2. A review of other Technical Specification required testing procedures (periodic tests and maintenance surveillance tests) revised between October 4, 1993, and January 15, 1994, was conducted to determine if other procedural changes had not been properly identified in the STSS database. No other Technical Specification concerns were identified.
3. STSS database was revised to reflect the changes in PTs-08.1.3a, b, and d.
4. AP-003 (Rev. 1) was revised on January 4, 1994, to require Document Control to route process forms generated by procedure changes to the appropriate work group.
5. AP-03, Rev. 3, was revised in April 1995 based on a plant assessment to provide directions on identifying and implementing training on procedure changes. These directions include identifying where job scope and responsibilities change and identifying the needed training to assure the to implement that change.

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Brunswick Steam Electric Plant Unit 1	05000325	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	4 of 4
		95	- 09 -	00	

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

6. The STSS database will be reviewed to verify that it continues to accurately schedule surveillances required by Technical Specifications. This will be completed by October 31, 1995.

SAFETY ASSESSMENT

The safety consequences of not testing the LPCI/RHR crosstie valve is minimal based on the crosstie valve being maintained in its proper position. This crosstie valve had its power removed by plant modifications to further control its position.

PREVIOUS SIMILAR EVENTS

None

EIIS COMPONENT IDENTIFICATION

System/Component

EIIS Code

Residual Heat Removal/Low Pressure Coolant Injection BO