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Radford J. Converse
Resident Manager

December 30, 1991
JAFP-91-0854

United States Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

SUBJECT: DOCKET NO. 50-333
LICENSEE EVENT REPORT: 91-028-00 - Shutdown and
Cooldown Not Completed Within
24-Hour Limit

Dear Sir:

This report is submitted in accordance with 10 CFR 50.73(a)(2)(i)(B).

Questions concerning this report may be addressed to
Mr. W. Verne Childs at (315) 349-6071.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'R. Converse'.

RADFORD J. CONVERSE

RJC:WVC:lar

Enclosure

cc: USNRC, Region I
USNRC Resident Inspector
INPO Records Center

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APPROVED ON 48 440 3185-0104
EXPIRES 6/31/2005

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| FACILITY NAME (1) | | | | | | | | | | DOCKET NUMBER (3) | | | | | | | | | | PAGE (5) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| JAMES A. FITZPATRICK NUCLEAR POWER PLANT | | | | | | | | | | 0 6 0 0 0 3 3 3 | | | | | | | | | | 1 OF 0 4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TITLE (4) Reactor Shutdown and Cooldown Not Complete Within Time Required Due to Personnel Error and Procedure Deficiency | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EVENT DATE (6) | | | | | LER NUMBER (8) | | | | | REPORT DATE (7) | | | | | OTHER FACILITIES INVOLVED (9) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| MONTH | | DAY | | YEAR | | YEAR | | SEQUENTIAL NUMBER | | REVISION NUMBER | | MONTH | | DAY | | YEAR | | FACILITY NAME | | | | | DOCKET NUMBER (8) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| OPERATING MODE (8) | | | | | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 43. (Check one or more of the following) (11) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| POWER LEVEL (10) 0 0 0 OTHER (Specify in Abstract below and in Part, NRC Form 305A) | | | | | 20.4000h | | | | | 20.4000h | | | | | 20.75h(12)(N) | | | | | 75.71h | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | 20.4000h(11)(B) | | | | | 20.30h(11)(1) | | | | | 20.75h(12)(N) | | | | | 75.71h | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | 20.4000h(11)(B) | | | | | 20.30h(12)(1) | | | | | 20.75h(12)(N) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | 20.4000h(11)(B) | | | | | 20.75h(12)(1) | | | | | 20.75h(12)(N)(A) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| LICENSEE CONTACT FOR THIS LER (12) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| NAME | | | | | | | | | | | | | | | TELEPHONE NUMBER | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| W. VERNE CHILDS, SENIOR LICENSING ENGINEER | | | | | | | | | | | | | | | AREA CODE 3 1 5 3 4 9 - 6 0 7 1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CAUSE | | | | | SYSTEM | | | | | COMPONENT | | | | | MANUFACTURER | | | | | REPORTABLE TO NRC | | | | | CAUSE | | | | | SYSTEM | | | | | COMPONENT | | | | | MANUFACTURER | | | | | REPORTABLE TO NRC | | | | | | | | | |
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| SUPPLEMENTAL REPORT EXPECTED (14) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| YES IF YES, ANTICIPATED EXPECTED SUBMISSION DATE) | | | | | | | | | | | | | | | X NO | | | | | | | | | | EXPECTED SUBMISSION DATE (16) MONTH DAY YEAR | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

IIIS Codes are in []

On November 28, 1991 while conducting a reactor shutdown and cooldown to meet the requirements of Technical Specification 3.7.D.3 as a result of inoperable primary containment [NH] isolation valves (see LER-91-026), the reactor temperature was not reduced to less than 212°F within 24 hours as required. Cooldown to less than 212°F was achieved in 25 hours and 6 minutes. The event was caused by personnel errors and procedure deficiencies. Operating shift resource were diverted to tasks other than meeting the Technical Specification requirement and the shutdown/cooldown process was delayed during performance of surveillance that could have been deferred until after the Technical Specification actions were met. Corrective action includes procedure changes and training to reduce the probability of recurrence. No similar LERs have been written at this facility.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMR NO. 311-0704

EXPIRES 8/21/85

FACILITY NAME (1)

JAMES A. FITZPATRICK
NUCLEAR POWER PLANT

DOCKET NUMBER (2)

05000333

LER NUMBER (3)

CLASS. SECT. TAL. REVISION
NUMBER NUMBER NUMBER

91-026-000

PAGE (4)

03 OF 04

TEXT (If more space is required, use additional NRC Form 365A's) (17)

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Description

On November 28, 1991, following an orderly reactor shutdown and during reactor cooldown, the 24-hour period allowed by the Technical Specifications for shutdown and cooldown was exceeded by 1.1 hours.

On November 27, 1991 at 1005 hours the primary containment (NH) isolation valves for both core spray system (BM) pump minimum flow lines were declared inoperable (see LER-91-026). Since it was not possible to complete modifications necessary to make the core spray system pump minimum flow valves operable within the 4-hour period allowed by Technical Specification 3.7.D.2, Specification 3.7.D.3 required initiation of an orderly shutdown and placing the reactor in the cold condition within the following 24-hour period.

The 24-hour time period allowed for shutdown and cooldown began at 1405 hours on November 27, 1991. At 1652 an orderly shutdown was initiated and an Unusual Event declared. During the orderly shutdown and cooldown several situations occurred which slowed down the process. The most significant of these situations was the diversion of some of the operating shift personnel for manipulation of the circulating water system (KE) in a troubleshooting effort to locate suspected main condenser (SG) tube leaks and performance of Average Power Range Monitor (APRM) (IG) surveillance.

At 1405 hours on November 28, 1991 the 24-hour period allowed for achieving reactor shutdown and cooldown expired with reactor coolant temperature at 252°F and reactor steam dome pressure at 16 psig. Reactor shutdown had previously been completed at 0930 hours. At 1443 hours Residual Heat Removal/Low Pressure Coolant Injection (RHR/LPCI) (BO) Loop B was placed in service in the shutdown cooling mode.

At 1510 hours reactor coolant temperature was reduced to less than 212°F thereby meeting the requirements to place the reactor in the cold condition. The Unusual Event was terminated at 1513 hours.

Cause

The event primary cause was personnel error (Cause Code A).
Procedural deficiencies were a contributing cause (Cause Code D).

The shift supervisor and/or assistant shift supervisor did not properly manage the shift personnel resources when some of those resources were diverted from the primary task of completing the shutdown and cooldown to a troubleshooting effort to locate suspected main condenser tube leaks.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO 3150-0104

EXPIRES 8/31/95

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| FACILITY NAME (1) JAMES A. FITZPATRICK NUCLEAR POWER PLANT | DOCKET NUMBER (2) 0 5 0 0 0 3 3 3 9 1 | LER NUMBER (6) | | | PAGE (3) | | |
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | | |
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TEXT (If more space is required, use additional NRC Form 308A's) (17)

Operating Procedure (OP) 65 titled, "Startup and Shutdown Procedure", provides guidelines for the sequencing of activities necessary to shutdown and cooldown the reactor. The procedure is intended for use during planned shutdown when no time limitations such as those imposed by Technical Specification 3.7.D.3 exist. As a result, OP-65 contains procedure steps which require the satisfactory performance of several surveillance requirements at discrete points in the shutdown and cooldown process. These surveillance requirements were fulfilled as stated in OP-65 resulting in a delay of 2 hours or more during the shutdown process.

Technical Specification 3.0.D. (which is comparable to 3.0.4. in Standard Technical Specifications) prohibits entry into a mode of operation unless the mode change can be made without reliance on the provisions (allowances) contained in Action statements, applicable in the mode to be entered. Technical Specification 3.0.D also notes that prohibiting the reliance on provisions in Action statements shall not prevent passage through modes required to comply with Action requirements. In other words, the personnel conducting the reactor shutdown and cooldown should not have delayed the shutdown and cooldown process in order to complete surveillance which was required for entry into or while in the "Startup/Hot Standby" or "Hot Shutdown" modes as part of meeting the requirements of Technical Specification 3.7.D.3.

Procedure OP-65 is deficient in that it does not contain any notes or explanation which reminds the user that the stated requirements for performance of certain surveillance when mode changes are made during a shutdown and cooldown required by Technical Specifications may be deferred (or not performed at all) if such deferral or omission is necessary to meet Technical Specification Actions within the required time.

Analysis

The failure to complete the shutdown and cooldown of the reactor within 24 hours as required by Technical Specification 3.7.D.3 was a violation of Technical Specifications and is an event requiring submittal of an LER under 10 CFR 50.73(a)(2)(i)(B). The cooldown to the cold condition was completed 66 minutes after the allowed 24-hour interval. It should be noted that a number of action requirements in the plant Technical Specifications require shutdown and cooldown within 24 hours while corresponding requirements in Standard Technical Specifications, in general, allow 6 hours to place the plant in the "Startup/Hot Standby" mode and allow an additional 24 hours (for a total 30 hours) to complete the reactor shutdown and cooldown.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (3)

PAGE (3)

JAMES A. FITZPATRICK
NUCLEAR POWER PLANT

YEAR

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NUMBERREVISION
NUMBER

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TEXT (if more space is required, use additional NRC Form 388A-1 (1))

Corrective Action

1. The shutdown and cooldown of the reactor was completed 66 minutes after the required time.
2. Operating Procedure 65 will be revised to clearly state that the completion of certain surveillance during the reactor shutdown and cooldown process may be deferred during forced shutdown and cooldown operations if necessary to meet the time limitations imposed by Technical Specifications.
Due date: March 24, 1992.
3. This event will be discussed with all licensed operators to stress the importance of the actions required by Technical Specifications and expected by plant management in meeting those requirements prior to startup following the 1992 Refuel Outage (currently scheduled for March 24, 1992). Due date: March 24, 1992.
4. This event will be incorporated in the Licensed Operator Qualification and Replacement Licensed Operator training programs as part of the general training in Technical Specifications. Due date: March 30, 1992.

Additional Information

Failed Components: None

Previous Similar Events: No similar events requiring the submittal of an LER have occurred at this facility.