



A Centenor Energy Company

EDISON PLAZA
300 MADISON AVENUE
TOLEDO, OHIO 43652-0001

AB-92-0003
NP-33-91-009

Docket No. 50-346

License No. NPF-3

January 9, 1992

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Gentlemen:

LER 91-009

Davis-Besse Nuclear Power Station, Unit No. 1
Date of Occurrence - December 8, 1991

Enclosed please find Licensee Event Report 91-009, which is being submitted to provide 30 days written notification of the subject occurrence. This LER is being submitted in accordance with 10 CFR 50.73(a)(2)(i).

Very truly yours,

Louis F. Storz
Plant Manager
Davis-Besse Nuclear Power Station

LFS/ed

Enclosure

cc: Mr. A. Bert Davis
Regional Administrator
USNRC Region III

Mr. William Levis
DB-1 NRC Sr. Resident Inspector

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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-430), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (P-153-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

Davis-Besse Unit No. 1

DOCKET NUMBER (2)

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PAGE (3)

TITLE (4)

Seal Test Not Performed on Emergency Air Lock

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 NAMES		DOCKET NUMBER(S)					
1	2	0	8	9	1	9	1	0	0	9	0	5	0	0	0	1
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § 17.46, if back one or more of the following: (11)																
OPERATING MODE (9)			20.402(b)			20.405(c)			50.73(a)(2)(iv)			73.71(b)				
POWER LEVEL (10)			20.405(a)(1)(i)			50.36(c)(1)			50.73(a)(2)(v)			73.71(c)				
0			20.405(a)(1)(ii)			50.36(c)(2)			50.73(a)(2)(vi)			OTHER (Specify in Abstract below and in Test. NRC Form 366A)				
			20.405(a)(1)(iii)			X 50.73(a)(2)(i)			50.73(a)(2)(viii)(A)							
			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)(ix)							

LICENSEE CONTACT FOR THIS LER (12)

NAME

TELEPHONE NUMBER

Andrew V. Antrassian, Associate Engineer - Nuclear Licensing

AREA CODE

4 1 9 3 1 2 1 1 - 1 7 1 0 1 8

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

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 December 5, 1991, with the plant in Mode 1, the Containment Emergency Air Lock (CEAL) inner door was cycled by Radiologic Control (RC) personnel during the performance of DB-HP-01101, Containment Entry. It was noted that the strong backs were removed from the CEAL inner door. On December 10, 1991, at 1130, with the plant in Mode 3, the Shift Supervisor discovered the time limit for performance of Technical Specification (TS) Surveillance Requirement 4.6.1.3.a had expired and declared the CEAL inoperable. Due to a miscommunication and conflicting information regarding CEAL alarm function, the CEAL outer door was tested and the CEAL was declared operable at 2355, on December 10, 1991. Plant startup commenced and proceeded to Mode 1. Subsequent to Mode 1 entry, the Shift Supervisor was informed that the CEAL inner door had been cycled on December 5, 1991. The CEAL was again declared inoperable. Both the inner and outer CEAL doors were satisfactorily tested and the CEAL was declared operable at 1604, on December 11, 1991. This event was caused by a deficiency in DB-HP-01101 and a miscommunication between RC and Operations personnel.

The strong backs are currently being stored outside the CEAL outer door in the CEAL block house. DB-HP-01101 has been changed to reflect the new storage location and to require notification of the Shift Supervisor in the event either CEAL door is opened. Troubleshooting of the CEAL inner door limit switch will be completed prior to the end of the Eighth Refueling Outage. DB-OP-02004, Reactor Coolant Alarm Panel 4 Annunciators, will be revised by January 31, 1992, to indicate the current alarm function of the CEAL.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-837), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20546, AND TO THE PAPERWORK REDUCTION PROJECT (3-60-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1): Davis-Besse Unit No. 1	DOCKET NUMBER (2): 0 5 0 0 0 3 4 6 9 1	LER NUMBER (8):			PAGE (3):		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
			0 0 9	0 0	0 2	OF	0 4

TEXT (If more space is required, use additional NRC Form 306A's) (17)

Description of Occurrence:

On December 5, 1991, at approximately 0945, with the plant in Mode 1 at 100 percent power, Radiological Control (RC) personnel cycled the Containment Emergency Air Lock (CEAL) inner door during the performance of DB-HP-01101, Containment Entry, to verify the strong backs were removed from the CEAL inner door, in preparation for a containment entry. This was accomplished by remote operation of the CEAL inner door from the handwheel located outside the CEAL outer door. The strong backs, which prevent opening of the CEAL inner door, were stored on brackets in the interior of the CEAL when not in use.

Technical Specification (TS) Surveillance Requirement 4.6.1.3.a requires that the operability of the CEAL be verified within 72 hours after each opening by performance of DB-SC-03293, Containment Emergency Air Lock Seal Test. Due to unrelated activities, the plant entered Mode 3 on December 6, 1991. On December 10, 1991, at approximately 1130, with the plant in Mode 3, the Shift Supervisor discovered that the 72 hour allowable time limit for performing DB-SC-03293 had expired. A unit log entry was made which stated that the CEAL was inoperable and that DB-SC-03293 would be satisfactorily completed within 24 hours (according to the TS 3.6.3.1 Action Statement) or prior to Mode 2 entry (according to TS 4.0.4), whichever occurred first.

Due to a miscommunication between RC and Operations personnel and conflicting information regarding the alarm function of the CEAL, the Shift Supervisor believed that the CEAL outer door had been cycled on December 5, 1991, when in fact the inner door had been cycled. DB-SC-03293 was satisfactorily completed on the CEAL outer door and the CEAL was declared operable at 2355, on December 10, 1991. Plant startup from Mode 3 was commenced and proceeded to Mode 1 without completing the required Surveillance on the CEAL inner door.

Subsequent to Mode 1 entry, the Shift Supervisor received information from RC personnel that it was in fact the CEAL inner door that had been cycled on December 5, 1991. The CEAL was again declared inoperable. DB-SC-03293 was satisfactorily completed for both the inner and outer CEAL doors and the CEAL was declared operable at 1604, on December 11, 1991.

This event constitutes a condition prohibited by TS Surveillance Requirements 4.6.3.1.a and 4.0.4 and is reportable as a LER under 10CFR50.73(a)(2)(i)(B).

Apparent Cause of Occurrence:

DB-HP-01101 requires verification that the CEAL strong backs are removed prior to certain containment entries. However, the method of verification is not discussed and no explicit guidance for notification of Operations personnel exists in this procedure in the event that a CEAL door is opened. The cause of the missed surveillance was the deficient procedural guidance of DB-HP-01101.

There are two factors which contributed to the failure to satisfy TS Surveillance Requirement 4.0.4.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P.530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

FACILITY NAME (1)

DOCKET NUMBER (2)

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Davis-Besse Unit No. 1

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TEXT (If more space is required, use additional NRC Form 385A's) (17)

Apparent Cause of Occurrence (Continued):

First, there was a miscommunication of information between RC and Operations personnel as to which CEAL door was actually opened during the December 5, 1991, verification of strong back removal. On December 10, 1991, Operations believed the outer door had been cycled based on initial notification from a RC supervisor. However, on December 11, 1991, the RC tester who performed the evolution notified the Shift Manager that he was certain that the CEAL inner door was cycled during the performance of DB-HP-01101.

Second, DB-OP-02004, Reactor Coolant Alarm Panel 4 Annunciators, indicates that the CEAL inner door provides an alarm to the control room. This alarm is received through computer point Z296. No alarm was received for this computer point on December 5, 1991, which appeared to indicate that the inner door had not been opened.

These two factors resulted in confusion as to which door was cycled and were contributing factors to the failure to satisfy TS Surveillance Requirement 4.0.4. In addition, proper operation of the CEAL alarm function could have prevented the missed surveillance by alerting Operations personnel of the December 5, 1991, cycling of the inner door.

Analysis of Occurrence:

DB-SP-03293 was performed three times during the course of this event. The CEAL outer door was tested twice and the inner door was tested once. Each test was completed satisfactorily. These satisfactory test results provide evidence that although the CEAL was inoperable, the equipment was not degraded and would have performed its required safety function if needed. Based on the above, this specific event has no safety significance.

Corrective Action:

The performance of TS surveillance test DB-SC-03293 was satisfactorily accomplished for both CEAL doors at 1604, on December 11, 1991.

The strong backs have been removed from the interior of the CEAL and are currently stored in the CEAL block house outside the CEAL outer door. DB-HP-01101 has been changed to state that verification of strong back removal is accomplished by locating the strong backs in their storage area outside CEAL outer door and that operation of the CEAL should not be required. Further, by January 16, 1992, DB-HP-01101 will be changed to require that the Shift Supervisor be notified for unit log entry and appropriate surveillance test performance prior to the opening of either CEAL door. This prior notification will ensure that miscommunications such as the one contributing to this event are precluded.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN, PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS/GOALS/DISCURSIONS/ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-830), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

DOCKET NUMBER (2)

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Davis-Besse Unit No. 1

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TEXT (If more space is required, use additional NRC Form 365A's (1/7))

Corrective Action (Continued):

An investigation was performed to determine the alarm function of the CEAL. Station Drawing E-556B and Vendor Drawing C-37-136 indicate that a limit switch exists on both CEAL doors and that these switches are wired such that opening of either CEAL door will alarm computer point Z296. This conflicts with DB-OP-02004, which indicates that only the inner door provides an alarm through computer point Z296. As part of the investigation, both CEAL doors were cycled on December 18, 1991, while maintaining verbal contact with the control room. The control room received an alarm only for the CEAL outer door. Therefore, Maintenance Work Order (MWO) 1-92-0052-00 has been written to perform troubleshooting on the CEAL inner door limit switch. This MWO will be completed prior to the end of the Eighth Refueling Outage. In the interim, DB-OP-02004 will be revised to indicate the current alarm function of the CEAL. This revision will be complete by January 21, 1992.

Failure Data:

Previous reports involving missed surveillance requirements and/or entry into a mode without surveillance requirements being performed are LER 91-002, LER 90-003, and LER 89-001. All involved mode changes without completion of applicable surveillance requirements.

NP 33-91-009

PCAQ No. 91-0615