

## LICENSEE EVENT REPORT (LER)

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

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) South Texas Unit 1 DOCKET NUMBER (2) 05000 498 PAGE (3) 1 OF 4

TITLE (4) Failure to Meet the Requirements of Technical Specifications Due To Not Testing a Contact of a Load Sequencer Relay

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
03	28	95	95	-- 004 --	00	04	26	95	SOUTH TEXAS, UNIT 2	05000 499
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9)	6	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (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 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 Jairo Pinzon - Staff Engineer TELEPHONE NUMBER (Include Area Code) (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 March 28, 1995, Unit 1 was in Mode 6 while in a refueling outage and Unit 2 was in Mode 1 at 100% power. While performing a review of procedures as part of the Surveillance Procedure Enhancement Program, it was determined that a contact (51-52) on load sequencer relay K243 had not been tested during the performance of the Train "A" Loss-of-Offsite-Power surveillance test. This condition was determined to be reportable due to failing to meet the requirements of Technical Specifications. This contact starts several minor fan loads. The cause of this event was less than adequate preparation, review and revision of the surveillance test procedure. Corrective actions included assembling a surveillance credit package for all trains of the Engineered Safety Features Diesel Loss-of-Offsite-Power surveillances which verified the operability of the specific loads in question and revising the Engineered Safety Features Diesel Loss-of-Offsite-Power surveillance procedure to include testing which verifies the operation of the specific loads in response to a Loss-of-Offsite-Power signal. Generic implications from this event are being addressed by the ongoing Surveillance Procedure Enhancement Program.

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TEXT CONTINUATION

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
South Texas, Unit 1	05000 498	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
		95	-- 004 --	00	

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

DESCRIPTION OF EVENT:

On March 28, 1995, Unit 1 was in Mode 6 while in a refueling outage and Unit 2 was in Mode 1 at 100% power. At approximately 1230 hours, while performing a review of procedures as part of the Surveillance Procedure Enhancement Program, it was determined that contact (51-52) on the load sequencer relay (K243) had not been tested during the performance of the Train "A" Loss-of-Offsite-Power surveillance test. As a result, it was determined that this condition was reportable due to failing to meet the surveillance requirements of Technical Specifications.

The contact in question, actuates the Y6 relay which starts the following components on a Loss-of-Offsite-Power signal:

- a) Electrical Auxiliary Building Electrical Penetration Air Handling Unit
- b) Electrical Auxiliary Building Battery Room Exhaust Fan
- c) Reactor Containment Building Cubicle Exhaust Fans
- d) Fuel Handling Building Heating, Ventilation and Air Conditioning Main Exhaust Fan

Technical Specification surveillance requirement 4.8.1.1.2e.4 requires that a Loss-of-Offsite-Power signal be initiated and, following shedding of bus loads, that the diesel "energizes the auto-connected shutdown loads through the load sequencer...". It was determined that the fans listed above are "auto connected shutdown loads" and, as such, did not meet the requirements of Technical Specification 4.8.1.1.2e.4.

Review of computer data from the last performance of the Loss-of-Offsite-Power tests for each of the Engineered Safety Features Diesels confirmed that all affected fans were operating immediately after the initiation of the Loss-of-Offsite-Power signal. Based on this computer data, it was verified that these fans performed as required during the last Loss-of-Offsite-Power surveillance performance. As such, the K243 and Y6 relays, contacts and above listed fans were operable. However, since Technical Specification surveillance requirements 4.8.1.1.2e.4 and 4.8.1.1.2e.6)b) had not been adequately evaluated and documented during past surveillance performances, this event was considered reportable.

The Nuclear Regulatory Commission was notified of this incident on March 29, 1995, at 0258 hours.

CAUSE OF EVENT:

The cause of this event was less than adequate preparation, review and revision of the surveillance test procedure.

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South Texas, Unit 1	05000 498	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 4
		95	-- 004 --	00	

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

ANALYSIS OF EVENT:

Failure to test contact 51-52 of the load sequencer relay K243 during performance of the Train "A" Loss-of-Offsite-Power surveillance test resulted in a failure to meet Technical Specification surveillance 4.8.1.1.2 and as such, is reportable pursuant to 10CFR50.73(a)(2)(i)(B). There were no adverse safety or radiological consequences as a result of this event. This event did not produce any additional risk to the public.

The criteria for operability during Loss-of-Offsite-Power testing is given by Technical Specification surveillance requirement 4.8.1.1.2e.4.b, which requires that the diesel "energizes the auto-connected shutdown loads through the load sequencer...". During a Loss-of-Offsite-Power, the fans in question are shed from the bus when the Load Center that feeds their Motor Control Centers is shed from the bus. Load Centers are verified shed as part of the Loss-of-Offsite-Power surveillance procedure. The fans are then given an immediate start signal by the sequencer via the Y6 relay.

Review of computer data from the last performance of the Loss-of-Offsite-Power tests for each of the Engineered Safety Features Diesels confirmed that all affected fans were operating immediately after the initiation of the Loss-of-Offsite-Power signal. The computer data indicated that these fans performed as required during the last Loss-of-Offsite-Power surveillance performance, the K243 and Y6 relays, contacts and above listed fans are considered operable.

From a diesel loading standpoint, the loads these individual fans place on the Standby Diesel Generator are insignificant compared to the other sequenced loads. The largest of the fan loads is the Fuel Handling Building Heating, Ventilation and Air Conditioning Main Exhaust Fan (25 kW) as compared to a High Head Safety Injection pump (785 kW) or a Centrifugal Charging Pump (450 kW). Surveillance credit packages were prepared and approved which demonstrate the satisfactory operation of the relays, contacts and fans.

CORRECTIVE ACTIONS:

The following corrective actions have been taken as a result of this event:

1. Following discovery of this condition, a surveillance credit package for all trains of the Engineered Safety Features Diesel Loss-of-Offsite-Power surveillances was assembled for both units which verified the operability of the specific loads in question.
2. The Engineered Safety Features Diesel Loss-of-Offsite-Power surveillance procedures have been revised to include testing which verifies operation of the specific loads in response to a Loss-of-Offsite-Power signal.

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South Texas, Unit 1	05000 498	95	-- 004 --	00	4 OF 4

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ADDITIONAL INFORMATION:

There have been several Licensee Event Reports previously submitted to the Nuclear Regulatory Commission regarding surveillances which did not adequately meet the testing required by Technical Specifications. Unit 1 Licensee Event Report 92-004 described a previous similar event. The ineffective corrective actions have been recognized and are being dealt with under the Surveillance Procedure Enhancement Program.

The scope of the Surveillance Procedure Enhancement Program currently encompasses approximately eleven hundred Technical Specification surveillance procedures. The project includes the development of a basis document for selected surveillance procedures to ensure the Technical Specification and the Updated Final Safety Analyses Report requirements are clearly identified. With the development of a basis document, future reviews of these procedures will be simplified by ensuring the reviewer better understands how the surveillance procedure complies with the Technical Specification requirements. The lessons learned while enhancing these surveillance procedures are being incorporated into the ongoing upgrade process. The Surveillance Procedure Enhancement Program is scheduled to be completed in 1998.