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March 9, 1992

William J. Cahill, Jr.
Group Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-445
CONDITION PROHIBITED BY TECHNICAL SPECIFICATIONS
LICENSEE EVENT REPORT 92-004-00

Gentlemen:

Enclosed is Licensee Event Report 92-004-00 for Comanche Peak Steam Electric Station Unit 1, "Invalid Surveillance of Class 1E Battery Due to Personnel Error."

Sincerely,

William J. Cahill, Jr.
William J. Cahill, Jr.

By: *Roger D. Walker*
R. D. Walker
Manager of Nuclear Licensing

NSH/tg

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (2)

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P. O. Box 1002 Glen Rose, Texas 76043-1002

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NRC FORM 308		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED OMB NO. 3150-0104 EXPIRES: 4/95 LP																							
LICENSEE EVENT REPORT (LER)				ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.8 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) COMANCHE PEAK - UNIT 1				Docket Number (2) 015101010141415	Page (3) 1 OF 015																						
Title (4) INVALID SURVEILLANCE OF CLASS 1E BATTERY DUE TO PERSONNEL ERROR																											
Event Date (5)		LER Number (6)		Report Date (7)																							
Month	Day	Year	Year	Sequential Number	Revision Number																						
01	30	92	92	01014	01010130992																						
Operating Mode (8)		Facility Name		Docket Number																							
1		N/A		015101010111																							
Power Level (10)		Facility Name		Docket Number																							
11010		N/A		015101010111																							
This report is submitted pursuant to the requirements of 10 CFR 43.11. (Check one or more of the following) (11): <table border="0" style="width: 100%;"> <tr> <td><input type="checkbox"/> 20.402(b)</td> <td><input type="checkbox"/> 20.405(a)</td> <td><input type="checkbox"/> 50.73(a)(2)(iv)</td> <td><input type="checkbox"/> 73.71(b)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(i)</td> <td><input type="checkbox"/> 50.36(a)(1)</td> <td><input type="checkbox"/> 50.73(a)(2)(v)</td> <td><input type="checkbox"/> 73.71(c)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(ii)</td> <td><input type="checkbox"/> 50.36(a)(2)</td> <td><input type="checkbox"/> 50.73(a)(2)(vi)</td> <td rowspan="3">Other (Specify in Abstract below and in Text, NRC Form 308A)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(iii)</td> <td><input checked="" type="checkbox"/> 50.73(a)(2)(i)</td> <td><input type="checkbox"/> 50.73(a)(2)(vii)(A)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(iv)</td> <td><input type="checkbox"/> 50.73(a)(2)(ii)</td> <td><input type="checkbox"/> 50.73(a)(2)(vii)(B)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(v)</td> <td><input type="checkbox"/> 50.73(a)(2)(iii)</td> <td><input type="checkbox"/> 50.73(a)(2)(viii)</td> <td></td> </tr> </table>						<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(a)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(a)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(a)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)	Other (Specify in Abstract below and in Text, NRC Form 308A)	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(vii)(A)	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(vii)(B)	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(viii)	
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Licensee Contact For This LER (12)																											
Name		Title		Telephone Number																							
D.E. BUSCHRAUM		COMPLIANCE SUPERVISOR		811781917-15181511																							
Complete One Line For Each Component Failure Described in This Report (13)																											
Cause	System	Component	Manufacturer	Reportable To NRC	Reportable To NRC																						
Supplemental Report Expected (14)					Expected Submission Date (15)																						
<input type="checkbox"/> Yes (If yes, complete Expected Submission Date)					Month Day Year																						
<input checked="" type="checkbox"/> No																											
Abstract (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)																											
<p>On January 27, 1992, the Train A, Class 1E, 125 Volt-direct current (Vdc) battery charger was in operation, supplying an equalizing charge to the Train A, Class 1E, 125 Vdc Battery-03. At 0700 on January 30, 1992, an electrician began performance of the weekly surveillance test of Battery-03. Surveillance prerequisites require the battery to be connected to the battery charger, with the charger in the FLOAT mode of operation. At 1300 on January 30, 1992, the surveillance was completed, with all prerequisites signed off as satisfied. On February 6, 1992, the System Engineer reviewed the surveillance test performed on Battery-03 and discovered that the surveillance was performed with the battery in EQUALIZE, rather than FLOAT, as required. On February 6, 1992, the surveillance was performed again, and Battery-03 declared OPERABLE.</p> <p>The root cause of this event was personnel error. Corrective actions include counseling of the individual involved.</p>																											

NRC FORM 305A LICENSEE EVENT REPORT (LER) TEXT CONTINUATION		U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92 ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 90.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC, 20545, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC, 20503.							
Facility Name (1) COMANCHE PEAK - UNIT 1	Docket Number (2) 015101010141415	LER Number (6) <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 10%;">Year</th> <th style="width: 10%;">Request Number</th> <th style="width: 10%;">Revision Number</th> </tr> <tr> <td>92</td> <td>0104</td> <td>010</td> </tr> </table>	Year	Request Number	Revision Number	92	0104	010	Page (3) 012 OF 015
Year	Request Number	Revision Number							
92	0104	010							

Text (if more space is required, use additional NRC Form 305A's) (17)

I. DESCRIPTION OF THE REPORTABLE EVENT

A. REPORTABLE EVENT CLASSIFICATION

Any operation or condition prohibited by the plant's Technical Specifications.

B. PLANT OPERATING CONDITIONS PRIOR TO THE EVENT

On January 30, 1992, Comanche Peak Steam Electric Station (CPSES) Unit 1 was in Mode 1, Power Operation, operating at 100 percent power.

C. STATUS OF STRUCTURES, SYSTEMS, OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

There were no inoperable structures, systems or components that contributed directly to the event.

D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES

On January 27, 1992, the Train A, Class 1E, 125 Volt-direct current (Vdc) battery charger (EISS:(BYC)(EJ)) was in operation, supplying an equalizing charge to the Train A, Class 1E, 125 Vdc Battery-03 (EISS:(BTRY)(EJ)). The equalizing charge was scheduled to be completed by January 30, 1992.

At 0700 on January 30, 1992, an electrician (utility, nonlicensed) began performance of the weekly surveillance test of Battery-03 to satisfy the requirements of Technical Specification (TS) 4.8.2.1.a. Surveillance prerequisites require the battery to be connected to the battery charger, with the charger in the FLOAT mode of operation. At 1300 on January 30, 1992, the surveillance was completed, with all prerequisites signed off as satisfied.

At 1500 on January 30, 1992, requirements for completion of the equalizing charge of Battery-03 were met and the equalizing charge was secured. Battery-03 had been on equalizing charge continuously since January 27, 1992.

NRC FORM 305A U.S. NUCLEAR REGULATORY COMMISSION LICENSEE EVENT REPORT (LER) TEXT CONTINUATION		APPROVED ON 3 NO. 9180-0194 EXPIRY: 4-30-92 ESTIMATED BURDEN FOR RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.8 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-550), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC, 20555, AND TO THE PAPERWORK REDUCTION PROJECT (9180-0194), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC, 20503.							
Facility Name (1)	Docket Number (2)	LER Number (6)	Page (3)						
COMANCHE PEAK - UNIT 1	015101010141415	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;">Year</td> <td style="width: 10%;">Sequence Number</td> <td style="width: 10%;">Revision Number</td> </tr> <tr> <td>912</td> <td>01014</td> <td>010</td> </tr> </table>	Year	Sequence Number	Revision Number	912	01014	010	013 OF 015
Year	Sequence Number	Revision Number							
912	01014	010							
Text (if more space is required, use additional NRC Form 305A's) (17)									
<p>E. <u>THE METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE, OR PROCEDURAL OR PERSONNEL ERROR</u></p> <p>On February 6, 1992, the System Engineer (utility, nonlicensed) was in the process of reviewing the surveillance test that had been performed on Battery-03 when he discovered that the surveillance was performed while the battery was in the EQUALIZE mode of operation, rather than the required FLOAT mode of operation. The System Engineer promptly documented the invalid surveillance via appropriate plant procedures.</p> <p>On February 6, 1992, the weekly surveillance of Battery-03 was again performed to satisfy TS 4.8.2.1.a. The System Engineer reviewed this surveillance to insure that the surveillance was performed in the FLOAT mode of operation, and to confirm operability of Battery-03. The surveillance was performed correctly and Battery-03 confirmed OPERABLE.</p>									
<p>II. <u>COMPONENT OR SYSTEM FAILURES</u></p> <p>A. <u>FAILURE MODE, MECHANISM, AND EFFECT OF EACH FAILED COMPONENT</u></p> <p>Not applicable - there were no component failures associated with this event.</p> <p>B. <u>CAUSE OF EACH COMPONENT OR SYSTEM FAILURE</u></p> <p>Not applicable - there were no component failures associated with this event.</p> <p>C. <u>SYSTEMS OR SECONDARY FUNCTIONS THAT WERE AFFECTED BY FAILURE OF COMPONENTS WITH MULTIPLE FUNCTIONS</u></p> <p>Not applicable - there were no failed components with multiple functions that affected this event.</p> <p>D. <u>FAILED COMPONENT INFORMATION</u></p> <p>Not applicable - there were no component failures associated with this event.</p>									

NRC FORM 366A		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92	
LICENSEE EVENT REPORT (LER) TEXT CONTINUATION				ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-500), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC, 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC, 20503.	
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Text (If more space is required, use additional NRC Form 366A's) (17)

III. ANALYSIS OF THE EVENT

A. SAFETY SYSTEM RESPONSES THAT OCCURRED

Not applicable - there were no safety system actuations associated with this event.

B. DURATION OF SAFETY SYSTEM TRAIN INOPERABILITY

Not applicable - there were no safety systems which were rendered inoperable due to a failure.

C. SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT

Operability of the Direct Current (DC) power sources and associated power distribution system during operation ensures that sufficient power will be available to supply the safety-related equipment for: 1) the safe shutdown of the facility, and 2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant DC power sources and distribution systems satisfy the requirements of General Design Criterion 17 of 10CFR50 Appendix A.

During this event the redundant DC power sources (Batteries -01, 02, 04), remained operable and capable of performing their intended safety function. Battery-03, although surveillance data was invalid, was proven operable on February 6, 1992. Consequently, it is concluded that this event did not result in a threat to the safe operation of CPSES Unit 1 or the health and safety of the public.

IV. CAUSE OF THE EVENT

ROOT CAUSE

The root cause of the event was personnel error. The electrician incorrectly assumed that the surveillance test prerequisites were previously performed and did not have to be performed by him prior to the test. As a result, the prerequisites were signed off as satisfied. Furthermore, the electrician knew that an equalize charge was in progress, however, felt that he was not allowed to interrupt the charge to perform a surveillance.

NRC FORM 366A		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92	
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Text (If more space is required, use additional NRC Form 366A's) (17)					

The electrician did not realize the strictness with which TS surveillances must be adhered to and that the prerequisites associated with surveillances are absolutes. This is considered an isolated case.

V. CORRECTIVE ACTIONS

A. CORRECTIVE ACTIONS TO PREVENT RECURRENCE

ROOT CAUSE

Personnel error.

CORRECTIVE ACTION

The individual involved in this event has been counselled by the Electrical Maintenance Production Supervisor (utility, nonlicensed). Procedure enhancements will be made to further prevent recurrence.

VI. PREVIOUS SIMILAR EVENTS

CPSES Licensee Event Reports (LER) 90-005, 90-010, 90-015, 90-024, 90-026, 90-034, 90-040, 90-044, 91-003, 91-007, 91-011, 91-017, 91-028, 91-030, 91-032, and 92-002 describe previous events involving TS surveillance activities. The details of these previously reported events are sufficiently different from the event described in LER 92-004 to conclude that previous corrective actions could not be expected to have prevented this event.

CPSES LER 90-013 involved an event in which work prerequisites were marked N/A and subsequently bypassed, resulting in a reactor trip. The root cause and subsequent corrective actions are sufficiently different from the event described in LER 92-004 and could not be expected to have prevented this event.

VII. ADDITIONAL INFORMATION

The times listed in the report are approximate and Central Standard Time.