

NRC Form 366 (5-92)		U.S. NUCLEAR REGULATORY COMMISSION				APPROVED BY OMB NO.3150-0104 EXPIRES 5/31/95						
<b>LICENSEE EVENT REPORT (LER)</b>												
(See reverse for number of digits/characters for each block)												
FACILITY NAME (1) <b>PILGRIM NUCLEAR POWER STATION</b>						DOCKET NUMBER (2) <b>05000-293</b>		PAGE(3) <b>1 of 4</b>				
TITLE (4) <b>Simulated Automatic Actuation Test Not Performed for the Automatic Depressurization System Prior to Plant Restart from Refueling Outage-10</b>												
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		
08	04	95	95	007	00	08	05	95	N/A	05000		
OPERATING MODE (9) N POWER LEVEL (10) 100 <b>THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR: (Check one or more) (11)</b>												
			20.402(b)		20.45(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)(vi)		OTHER			
			20.405(a)(1)(iii)		X 50.73(a)(2)(i)(B)		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)					
<b>LICENSEE CONTACT FOR THIS LER (12)</b>												
NAME <b>Robert L. Cannon - Senior Compliance Engineer</b>						TELEPHONE NUMBER (Include Area Code) <b>508-830-8321</b>						
<b>COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)</b>												
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		
<b>SUPPLEMENTAL REPORT EXPECTED (14)</b>								<b>EXPECTED SUBMISSION DATE(15)</b>		MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)				X NO								
<b>ABSTRACT</b> (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)												
<p>On August 4, 1995, during an audit of the Core Spray System it was discovered by the Instrumentation and Control Engineering Division Manager that the Simulated Automatic Actuation (SAA) test for the Automatic Depressurization System had not been performed prior to plant restart following Refuel Outage (RFO) No. 10 as required by Technical Specification 4.5.E.1.a. The Control Room was notified and a 24-hour limiting condition for operation was entered on August 4, 1995 at 1645 hours as required by Technical Specification 3.5.E.3. Immediate corrective action was taken to perform the required SAA surveillance test. The surveillance was successfully performed and the LCO was exited on August 4, 1995 at 2016 hours. The missed surveillance occurred because the Master Surveillance Tracking Program (MSTP) did not identify the requirement "prior to startup from each refueling outage". The MSTP has been modified to reflect the requirement to perform the surveillance "prior to startup from each refueling outage" in accordance with Technical Specification 4.5.E.1.a.</p> <p>Concurrent with the above actions, a review was performed to provide assurance that other surveillance tests with similar, prior to startup following each RFO requirements had not been missed. The review concluded the missed surveillance test was the only surveillance required prior to startup from RFO No. 10 that had not been performed. On August 21, 1995, it was identified that the quarterly valve test for the Core Spray System "B" loop valves had not been performed prior to startup. The details of this missed surveillance will be discussed in LER 95-009-00.</p> <p>The missed Technical Specification surveillance requirement was identified with the plant at 100 percent power with the reactor mode selector switch in the RUN position. The Reactor Vessel pressure was 1035 psig with the reactor water at saturation temperature for the reactor pressure. This event posed no threat to the public health and safety.</p>												

## 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 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)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
PILGRIM NUCLEAR POWER STATION	05000-293	95	007	00	2 of 4

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

EVENT DESCRIPTION

On August 4, 1995, during a Quality Assurance audit of the Core Spray System it was discovered by the I&C Engineering Division Manager that the Simulated Automatic Actuation (SAA) Test for the Automatic Depressurization System (ADS) had not been performed prior to plant restart following Refuel Outage No. 10 as required by Technical Specification 4.5.E.1.a. Problem Report (PR) 95.9429 was written to document the identified discrepancy and the Control Room was informed. At 1645 hours, a 24-hour Limiting Condition for Operation (LCO) was entered with preparations underway for performance of surveillance Procedure 8.M.2-2.10.9.1, "ADS Logic Rx Other than Shutdown," to confirm continued operability of the ADS circuitry. At 1957 hours on August 4, 1995, Procedure 8.M.2-2.10.9.1 was satisfactorily completed and at 2016 hours the LCO was exited.

Concurrent with the above actions, a review was performed to provide assurance that other surveillance tests with similar, prior to startup requirements had not been missed. The review, was performed by the Operations Section Manager, the Chief Operating Engineer and Technical Programs Division. The review concluded Procedure 8.M.2-2.10.9 "Depressurization System Logic when Reactor is Shutdown" was the only surveillance required prior to startup following Refueling Outage No. 10 that had not been performed. On August 21, 1995 it was identified that the quarterly valve test for the Core Spray System "B" Loop valves had not been performed prior to startup. Although this was not schedule as a RFO frequency, the due/dead date was such that the procedure needed to be performed prior to startup. The details of this missed surveillance will be discussed in LER 95-009-00.

The missed Technical Specification surveillance requirement was identified while the plant was at 100 percent power with the reactor mode selector switch in the RUN position. The reactor vessel pressure was 1035 psig with the reactor water at saturation temperature for the reactor pressure.

CAUSE

The root cause of the missed surveillance was personnel error. The initial data entry information (Circa 1985) for the Master Surveillance Tracking Program NODE 2940 did not identify the requirement "prior to startup from each refueling outage". The surveillance frequency for Procedure 8.M.2-2.10.9 (NODE 2940) was entered as "semi-annual". Technical Specification 4.5.E.1.a requires the surveillance to be performed "once per refueling outage prior to startup." A review was performed to provide assurance that other surveillance tests with similar, prior to startup requirements were correctly identified in MSTP and performed prior to startup from RFO-10. No discrepancies were identified. A review of prior refueling outages identified that the same surveillance had also not been performed prior to startup from Refueling Outage No. 9.

## 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 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)		DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
			YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
PILGRIM NUCLEAR POWER STATION		05000-293	95	007	00	3 of 4

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

In June of 1994, MSTP NODE 2940 was revised to change the frequency from "semi-annual" to "24-months". The change to the MSTP was made in accordance with Procedure 1.8, "Master Surveillance Tracking Program". Although the review process for revising the MSTP provided an opportunity to identify the discrepancy between Technical Specification 4.5.E.1.a and MSTP Node 2940, this discrepancy was not identified until August 4, 1995 when questions were raised during a quality assurance audit of the Core Spray System. Further review of Procedure 1.8 concluded that enhanced guidance for the review of changes/revisions to the MSTP was warranted to minimize the potential for error and aid in ensuring the ongoing accuracy of the MSTP.

CORRECTIVE ACTION

For Procedure 8.M.2-2.10.9, the MSTP has been modified to identify the proper surveillance requirement of "prior to startup following each refueling outage". Other "prior to startup" surveillances were reviewed and verified to be correctly entered in the MSTP. Based on our reviews, the error in MSTP NODE 2940 appears to be an isolated occurrence.

Procedure 1.8 will be revised to provide enhanced guidance for reviewers of MSTP changes/revisions.

Any further review or actions regarding the MSTP will be addressed as a part of the resolution of Problem Report (PR) 95.9429. If during the resolution of PR95.9429, new information is identified that significantly impacts the cause or corrective actions described in this LER, then an LER update will be provided.

SAFETY CONSEQUENCES

This event posed no threat to public health and safety.

The ADS System functions to reduce the reactor pressure so that low pressure water from the Low Pressure Coolant Injection (LPCI) system and the Core Spray System can enter the reactor vessel to cool the core and limit fuel clad temperatures in the unlikely instance the Feedwater System, the Control Rod Drive (CRD) System, Reactor Core Isolation Cooling (RCIC) System, and High Pressure Coolant Injection (HPCI) System are not sufficient to maintain the reactor water level.

The satisfactory performance of Procedure 8.M.2-2.10.9.1 on August 4, 1995 confirmed the continued operability of the ADS to perform its design function. Procedure 8.M.2-2.10.9.1 has also been performed on a semi-annual frequency up until the June 1994 MSTP revision changing the frequency to a 24 month interval.

This report is submitted in accordance with 10 CFR 50.73(a)(2)(i)(B) because the requirements of Technical Specification 3/4.5.E were not met prior to plant startup following RFO-9 and RFO-10.

## 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 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)		DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
			YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
PILGRIM NUCLEAR POWER STATION		05000-293	95	007	00	4 of 4

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

SIMILARITY TO PREVIOUS EVENT(S)

A review of Licensee Event Reports (LERs) issued since 1984 was conducted. The review focused on reports submitted in accordance with 10 CFR 50.73(a)(2)(i)(B) which involved a missed surveillance that resulted from an incorrect frequency, plant condition, or performance responsibility as specified on the MSTP. The review identified related instances reported in LER 50-293/90-007-00 and LER 86-022-00.

LER 90-007-00 reported that when restarting from RFO-7, Procedure 8.A.2, "Drywell to Suppression Chamber Vacuum Breaker Leakage Rate Test" was not performed prior to reactor criticality in accordance with T.S. requirements. The cause was the surveillance was incorrectly rescheduled on the MSTP.

LER 86-022-00 reported that on August 29, 1986, a Quality Assurance surveillance discovered a radioactive source controlled by the Chemistry Group that had not been leak checked at a six month interval as required by Technical Specification Section 4.2.b. The cause was due to an administrative realignment of the Radiological and Chemistry responsibilities which had occurred on June 1, 1985. At that time the MSTP was not changed to show the leak check surveillance requirement as a Chemistry responsibility.

ENERGY INDUSTRY IDENTIFICATION (EII) CODESSYSTEMS

Automatic Depressurization System (ADS)  
Low Pressure Core Spray (LPCS)

CODES

JE  
BM