

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Robert E. Ginna, Unit 1										DOCKET NUMBER (2) 0 5 0 0 0 2 4 4				PAGE 13 1 OF 0 3		
TITLE (4) Failure to Exercise Control Rods in Bank D																
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 NAMES			DOCKET NUMBER(S)				
10	15	84	84	013	001	11	14	84				0 5 0 0 0				
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 8: (Check one or more of the following) (11)																
OPERATING MODE (8)		N		20.402(b)		20.463(a)		80.73(a)(2)(iv)		73.71(b)						
POWER LEVEL (10)		1 0 0		20.406(a)(1)(i)		80.38(a)(1)		80.73(a)(2)(v)		73.71(e)						
				20.406(a)(1)(ii)		80.38(a)(2)		80.73(a)(2)(vi)		OTHER (Specify in Abstract below and in Text, NRC Form 306A)						
				20.406(a)(1)(iii)		80.73(a)(2)(i)		80.73(a)(2)(vii)(A)								
				20.406(a)(1)(iv)		80.73(a)(2)(ii)		80.73(a)(2)(vii)(B)								
				20.406(a)(1)(v)		80.73(a)(2)(iii)		80.73(a)(2)(x)								
LICENSEE CONTACT FOR THIS LER (12)																
NAME Thomas A. Meyer, Technical Manager										TELEPHONE NUMBER AREA CODE 3 1 5 5 2 4 - 4 4 4 6						
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS						
D	A	A - R O D W	3 5 1	N												
SUPPLEMENTAL REPORT EXPECTED (14)																
YES (If yes, complete EXPECTED SUBMISSION DATE)										X NO		EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On the afternoon of October 15, 1984, a review of an October 11, 1984, surveillance test revealed that the controlling bank of rods (Bank D) was not tested in accordance with Technical Specifications. Procedure changes incorporating Technical Specification amendment No. 40 failed to eliminate an initial condition which allowed testing of the controlling bank to be omitted. Since April 17, 1981, control bank D testing has been required but has not been performed. On the afternoon of October 16, 1984, Control Bank D was satisfactorily tested. The cause of this event has been attributed to a procedure deficiency and a failure to properly implement an amendment to Technical Specifications. Corrective actions that have already been taken include procedure changes which will preclude similar events from occurring in the future.

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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)		
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TEXT (If more space is required, use additional NRC Form 388A's) (17)

On the afternoon of October 15, 1984, a review of an October 11, 1984, surveillance test revealed that one control rod (C05) in the shutdown bank failed to demonstrate movement of at least ten steps in any one direction as indicated by recorded data. In addition, during a review of Technical Specifications for reportability of the individual rod, it was discovered that the controlling bank of rods (Bank D) was not tested. The condition of not exercising control bank D has existed since April 17, 1981, when amendment No. 40 to the Technical Specifications was issued. This amendment required monthly movement of at least ten steps in any one direction for any rod not fully inserted. Prior to 1981 Technical Specifications only required that partial movement of all rods be demonstrated and since the controlling bank frequently changes position there was no specific requirement to test it. In December of 1982 procedure changes were approved which incorporated Technical Specification amendment No. 40. These changes included adding the ten step requirement for individual rods but failed to eliminate an initial condition which allowed testing of the controlling bank to be omitted. Since April 17, 1981, when it became a requirement, the controlling bank was only tested at hot shutdown conditions prior to plant startups. Surveillance testing of the controlling bank was omitted at all other times. Even though control bank D was not tested, all rods in the bank could be considered operable since:

- 1) They appropriately achieved their rod drop time of less than or equal to 1.8 seconds.
- 2) They were properly aligned within plus or minus twelve steps of their group step counter demand position.
- 3) They were not known to be immovable due to excessive friction or mechanical interference.
- 4) They were not known to be untripable.

Upon discovery of this event control room personnel were notified and immediately performed a retest to verify operability of control rod C05 in the shutdown bank. This retest satisfactorily demonstrated that rod C05 moved at least ten steps in one direction. It was later discovered after a review of a computer printout that rod C05 did successfully move at least ten steps during the test on October 11, 1984. The apparent inconsistency in the data has been attributed to a transposing error.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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EXPIRES 8/31/85

FACILITY NAME (1)

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Robert E. Ginna, Unit 1

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TEXT (If more space is required, use additional NRC Form 388A's) (17)

On the night of October 15, 1984, it was presumed that a power reduction of up to four percent may have resulted when testing the control rods in bank D. It was decided not to test the controlling bank pending further investigation by the plant staff. Calculations were performed the morning of October 16, 1984, which indicated that testing the controlling bank would have virtually the same effect as testing the shutdown bank. On the afternoon of October 16, 1984, control bank D was successfully tested and no ensuing plant transient resulted nor was a power reduction required.

In addition to the testing of selected control rod banks, other short term actions included the changing of the surveillance procedure to eliminate the initial condition allowing the testing of the controlling bank to be omitted.

Long term corrective actions will be to change the surveillance procedure to adequately define acceptance criteria limits directly on the data sheets in addition to the Test Requirements section. Also, a letter will be directed to all qualified level II test personnel in the Operations section emphasizing the importance of adequately performing, analyzing and reviewing Technical Specification surveillance activities. These corrective actions will be completed by December 15, 1984. Additionally, Administrative procedures were changed in December of 1983 which require the Plant Operations Review Committee (PORC) to review all approved changes to the Technical Specifications and require the PORC chairman to be responsible to delegate the appropriate section manager(s) the required work necessary to implement the new Technical Specification amendment.



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001

ROGER W. KOBER
VICE PRESIDENT
ELECTRIC & STEAM PRODUCTION

TELEPHONE
AREA CODE 716 546-2700

November 14, 1984

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Subject: LER 84-013, Failure to Exercise Control Rods in Bank D
during Monthly Surveillance Test.

R. E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

Gentlemen:

In accordance with 10CFR50.73 "Licensee Event Report System" item (a)(2)(i)(B), which requests a report of "Any operation or condition prohibited by the plant's Technical Specifications" the attached Licensee Event Report LER 84-013 is hereby submitted.

Very truly yours,


Roger W. Kober

xc: U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

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