

## LICENSEE EVENT REPORT (LER)

APPROVED OMB NO. 3180-0104  
EXPIRES - 9/31/85

FACILITY NAME (1) Limerick Generating Station-Unit 1										DOCKET NUMBER (2) 050101315121				PAGE (3) OF 014										
TITLE (4) Procedural deficiency in the daily surveillance log																								
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	0	2	7	8	4	8	4	-	0	0	1	-	0	0	1	1	2	6	8	4	0501010111			
OPERATING MODE (9) 5			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)																					
POWER LEVEL (10) 01010			20.402(b)			20.406(e)			60.73(a)(2)(iv)				73.71(a)											
			20.406(a)(1)(i)			60.34(a)(1)			60.73(a)(2)(v)				73.71(a)											
			20.406(a)(1)(ii)			60.34(a)(2)			60.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 306A)											
			20.406(a)(1)(iii)			60.73(a)(2)(i)			60.73(a)(2)(iii)(A)															
			20.406(a)(1)(iv)			60.73(a)(2)(ii)			60.73(a)(2)(iii)(B)															
			20.406(a)(1)(v)			60.73(a)(2)(iii)			60.73(a)(2)(iv)															
LICENSEE CONTACT FOR THIS LER (12)																								
NAME B. L. Clark, Sr. Engineer, Special Projects										TELEPHONE NUMBER 21115 84114 1510117														
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								
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)												<input checked="" type="checkbox"/> NO												

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

Abstract: 84-001

On October 27, 1984 at approximately 1:30 p.m. during fuel loading prior to initial criticality, a single control rod was withdrawn while the reactor was in operational condition 5 (refueling), channel checks of the four scram discharge volume level transmitters and the four refueling area ventilation exhaust duct radiation monitors were not performed as required by the plant's Technical Specifications. Upon discovery of these omissions, channel checks were performed and the Daily Surveillance Log ST-6-107-591, was revised to clarify these surveillance actions. These revisions were formally approved by the facility's Plant Operational Review Committee on October 30, 1984.

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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 (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Limerick Generating Station Unit 1	0 5 0 0 0 3 5 2 8 4	-	0 0 1	-	0 0 0 2	OF 0 4	

TEXT (if more space is required, use additional NRC Form 364s) (17)

Description of the Event:

On October 27, 1984, at approximately 1:30 p.m. with the facility at zero percent power level during the initial core loading, a single control rod was withdrawn while in operational condition 5 (refueling). Table 4.3.1.1-1(8a) of the Technical Specifications requires that in operational condition 5, with any control rod withdrawn, a 12-hour channel check must be performed on the four scram discharge volume (SDV) level transmitters. However, channel checks to the four SDV level transmitters as required per Surveillance Test ST-6-107-591-1 'Daily Surveillance Log' were not performed on the 7 a.m. to 3 p.m. shift of October 27, 1984, because, at the time the operator took the reading and marked it "N/A", no control rods were withdrawn. Channel checks of the SDV level transmitters were performed on the prior 11 p.m. to 7 a.m. shift and the subsequent 3 p.m. to 11 p.m. shift.

In addition, Table 4.3.2.1-1(7c) of the Technical Specifications requires that the four refueling area ventilation exhaust duct radiation monitors must be channel checked every twelve hours during Core Alteration. However, this surveillance requirement was not identified in the Daily Surveillance Log ST-6-107-591-1. As a result, the channel checks for the four refueling area ventilation exhaust duct radiation monitors were not performed prior to the 3 p.m. to 11 p.m. shift of October 27, 1984.

Following the discovery of the failure to perform the channel checks of the four SDV level transmitters and the four refueling area ventilation exhaust duct radiation monitors, a temporary procedure change (TPC) was made to the daily surveillance log surveillance test ST-6-107-591-1 and channel checks were performed for both the SDV level transmitters and the refueling area ventilation exhaust duct radiation monitors during the 3 p.m. to 11 p.m. shift of October 27, 1984. Unfortunately, the format of the TPC lacked clarity and as a result, the subsequent shift misinterpreted the TPC and did not perform the channel checks of the four refueling area ventilation exhaust duct radiation monitors during the period 11 p.m. to 7 a.m. ending October 28, 1984. This omission was recognized on the 7 a.m. to 3 p.m. shift of October 28, 1984 and the refueling area ventilation exhaust duct radiation monitor channel checks were resumed at that time. The format of the TPC regarding the refueling area ventilation exhaust duct radiation monitor channel checks was subsequently improved for clarity.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			

TEXT (If more space is required, use additional NRC Form 366a) (17)

Consequences of the Event:

The results of the channel checks of the four SDV level transmitters revealed a zero percent level in the SDV during the shift prior to and the shift immediately following the shift in which the SDV level transmitter channel checks were not performed. In addition, since startup activities at this time cause all control rods to be fully inserted except for friction tests of single rods, no reactor conditions could have taken place to require a scram.

The results of the channel checks of the four refueling area ventilation exhaust duct radiation monitors revealed measured quantities indicative of normal fluctuations of background radiation. Since the reactor has not been critical, only background radiation is possible in the plant at this time.

Cause of the Event:

The failure to perform the required channel checks of the SDV level transmitters was caused by a misinterpretation by operations personnel of the Surveillance Test ST-6-107-591-1 "Daily Surveillance Log".

The failure to perform the required channel checks of the refueling area ventilation exhaust radiation monitors was caused by a procedural deficiency (Surveillance Test ST-6-107-591-1 did not include this channel check) and a misinterpretation by operations personnel of the temporary procedure change to the Surveillance Test ST-6-107-591-1.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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APPROVED OMB NO. 3150-0104

EXPIRES 8/31/85

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TEXT (if more space is required, use additional NRC Form 368A (1/7))

Corrective Actions:

As stated above, following discovery of the missed SDV level transmitter channel checks and the refueling area ventilation exhaust duct radiation monitor channel checks, a TPC was made to ST-6-107-591-1 during the 3 p.m. to 11 p.m. shift on October 27, 1984 to clarify the requirements of performing channel checks to the SDV level transmitters during operational condition 5. This change now requires performance of SDV level transmitter channel checks when in operational condition 5, whether or not control rods are being withdrawn.

The same TPC also added the requirements of performing channel checks to the refueling area ventilation exhaust duct radiation monitors. This latter change requires channel checking during operational conditions 4 (Cold Shutdown) and 5 (Refueling).

The modified SDV level transmitter channel check requirement and the requirement to perform refueling area ventilation exhaust duct radiation monitor channel check were formally approved by the Limerick Generating Station Plant Operational Review Committee as revision 5 to ST-6-107-591-1 on October 30, 1984. In addition, a review of the Technical Specifications against the written Surveillance Tests has been initiated.

PHILADELPHIA ELECTRIC COMPANY

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November 26, 1984

Docket No. 50-352

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Washington, DC 20555

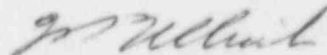
SUBJECT: Licensee Event Report

This LER concerns a procedural deficiency in the Daily Surveillance Log pertaining to performance of scram discharge volume level transmitter and refueling area ventilation exhaust duct radiation monitor channel checks as required by the Technical Specifications 4.3.1.1 and 4.3.2.1 respectively.

Reference:	Docket No. 50-352
Report Number:	84-001
Revision Number:	00
Event Date:	October 27, 1984
Report Date:	November 26, 1984
Facility:	Limerick Generating Station Box A, Sanatoga, PA 19464

This LER is submitted pursuant to the requirements of 10 CFR 50.73 (a)(2)(i).

Very truly yours,



W. T. Ullrich  
Superintendent  
Nuclear Generation Division

cc: Dr. Thomas E. Murley, Administrator  
Region I, USNRC

See Attached Service List

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cc: Judge Helen F. Hoyt  
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Judge Richard F. Cole  
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