NRC FORM 366 (6.89) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

APPROVED OMB NO. 3150-0104
EXPIRES: 4/30/92

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-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)	DOCKET NUMBER (2)	PAGE (3)
Perry Nuclear Power Plant, Unit 1	0 5 0 0 0 4 4 0	1 OF 0 4

TITLE (4): Failure to Perform Surveillance Results in Two Inoperable Intermediate Range Monitor Channels and Violation of Technical Specification 3.3.1

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)
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0 5	0 3	9 2	9 2	—	0 1 1	—	0 0	0 6	0 2	9 2		0 5 0 0 0

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
5		20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
0 0 0		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		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	TELEPHONE NUMBER
	AREA CODE
Henry L. Hegrat, Compliance Engineer, Extension 5185	2 1 6 2 5 9 - 3 7 3 7

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 fifteen single-space typewritten lines) (16)

On May 3, 1992 at 0617, two Intermediate Range Monitoring (IRM) channels became inoperable due to failure to complete Technical Specification (TS) 3.3.1 surveillance requirements. Additionally, TS ACTION requirements for the inoperable monitors were not performed within the TS allowable outage times. On May 3, 1992 at 1430, control room personnel identified the fact that Surveillance Instruction SVI-C51-T0022C "IRM C and G Neutron Flux Trips Channel Functional Test for 1C51-K601C and 1C51-K601G" was past its due date, and followed required TS 3.3.1 ACTION requirements by inserting a half scram on Reactor Protection System (RPS) Channel C at 1450. Surveillance instruction SVI-C51-T0022C was successfully performed on May 3, 1992 at 1636.

The cause of this event was personnel error, failure to follow procedure. When reviewing the surveillance schedule on May 2, 1992, the Unit Supervisor failed to refer to SVI-C51-T0022C to determine Technical Specification (TS) requirements, as required by plant administrative procedures.

To prevent recurrence, the Unit Supervisor was counseled with respect to the requirement for procedural compliance. Additionally, as part of the established requalification training program, all plant licensed operators will be instructed on the lessons learned from this event.

I. Introduction

On May 3, 1992 at 0617, two Intermediate Range Monitoring (IRM) channels became inoperable due to failure to complete Technical Specification (TS) surveillance requirements. Additionally, TS ACTION requirements for the inoperable monitors were not performed within the TS allowable outage times. At the time of the event, the plant was in Operational Condition 5 (Refueling) with reactor vessel [RPV] head removed and reactor coolant at 81°F. This event is being reported under the requirements of 10CFR50.73(a)(2)(i)(B).

II. Event Description

On April 24, 1992 at 1217, Surveillance Instruction (SVI-C51-T0022C) "IRM C and G Neutron Flux Trips Channel Functional Test for 1C51-K601C and 1C51-K601G" was successfully performed, satisfying the requirements of Technical Specification Table 4.3.1.1-1 Items 1.a and 1.b. The next routine performance of this functional check was required to be completed prior to May 3, 1992 at 0617, to satisfy operability requirements of the associated Reactor Protection System (RPS) instrumentation channels.

On May 2, 1992, the Unit Supervisor performed a review of the TS surveillance status review sheet, as required by plant administrative procedures. The surveillance status review sheet noted the fact that SVI-C51-T0022C was scheduled to be performed prior to the end of the day. The Unit Supervisor verified that TS 3.3.6, with respect to control rod block instrumentation channels, was satisfied, and allowed the surveillance to be deferred.

On May 3, 1992 at 0617, two Intermediate Range Monitoring (IRM) channels became inoperable due to the late surveillance. The required action statements of Technical Specification 3.3.1, which requires the associated trip system to be placed in the tripped condition, were not performed. On May 3, 1992 at 1430, control room personnel identified the fact that SVI-C51-T0022C was past its due date, and followed TS 3.3.1 ACTION requirements by inserting a half scram on Reactor Protection System (RPS) Channel C at 1450. Surveillance Instruction SVI-C51-T0022C was successfully performed on May 3, 1992 at 1636. Accordingly, TS 3.3.1 surveillance requirements were satisfied, and the Unit Supervisor declared the two IRM channels operable at 1638.

III. Cause Analysis

The cause of this event was personnel error, failure to follow procedure. Plant Administrative Procedure (PAP-1105) "Surveillance Test Control" requires the Control Room Unit Supervisor to perform a review of a controlled copy of the surveillance instruction if a test is not to be performed as scheduled. When reviewing the surveillance schedule on May 2, 1992, the Unit Supervisor failed to refer to SVI-C51-T0022C to determine Technical Specification (TS) requirements.

May 29, 1992 SECY-92-200

For: The Commissioners

From: James M. Taylor
Executive Director
for Operations

Subject: UPDATED REPORT ON SITE DECOMMISSIONING MANAGEMENT PLAN

Purpose: To provide the Commission with a status report on the actions that the staff has been taking toward cleanup of the sites in the Site Decommissioning Management Plan (SDMP) and to provide the Commission with Revision 2 of the SDMP (see Enclosure 1), which formally updates the April 1991, version of the SDMP provided to the Commission in SECY-91-096.

Summary: The staff continues to implement the SDMP to effectively use available staff resources to resolve decommissioning policy and regulatory issues and to prompt or compel, as necessary, timely decommissioning at SDMP sites. Since the last update of the SDMP report, in April 1991, program management has been enhanced and intensified to better ensure that priority attention is placed on the timely resolution of issues and timely site decommissionings.

Progress continues to be steady, but slower than desired, and to suffer from various obstacles and difficulties stemming from circumstances beyond the control of the staff. These obstacles include, for example, the lack of firm residual radioactivity criteria for cleanup, the presence of mixed

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He reviewed a Potential Limiting Condition For Operation Tracking Sheet which referenced TS 3.3.6 control rod block instrumentation channel requirements, and assumed that it was the only applicable Technical Specification for IRMs. Had he reviewed the approved Surveillance Instruction, he would have been reminded that T.S. 3.3.1 was also applicable.

IV. Safety Analysis

The Intermediate Range Monitoring (IRM) System provides neutron flux information during reactor startup and heatup operations from the upper portion of the source range (SRM) to the lower portion of the power range. The design safety objective of the IRM system is to generate a trip signal that can be used to prevent fuel damage resulting from abnormal operational transients that occur while operating in the intermediate range. The IRM System accomplishes this by sensing incore neutron flux and initiating trip inputs to the Reactor Protection System (RPS). Channel independence and redundancy, coupled with conservative trip set values, ensure protection of the fuel barrier from excess power generation.

The RPS System provides protection against the onset and consequences of conditions that threaten the integrity of the fuel barrier and reactor coolant pressure boundary. This protection is provided by causing rapid insertion of all control rods into the reactor core to shut down the reactor, when specific variables exceed predetermined limits.

On May 3, 1992 at 1636, the IRM Channels were functionally checked through the satisfactory performance of SVI-C51-T0022C, without requiring any adjustments. As a result of the successful testing on May 3, 1992, it can be assumed that the instrumentation was capable of performing its intended function if required throughout the period of May 3, 1992 0617 to 1638. Additionally, all control rods were fully inserted during this period of time. Therefore, this event is not considered to be safety significant.

V. Similar Events

A previous similar event occurred as documented by LER 90-028. On October 9, 1990, during core alterations, seven containment isolation valves were inoperable for greater than four hours without all associated penetrations isolated in accordance with Technical Specification 3.6.4. The seven containment isolation valves had become inoperable due to the failure to perform surveillance testing required by Technical Specifications. The cause of this event was personnel error, inattention to detail. When revieving the surveillance schedule, the Unit Supervisor failed to refer to Technical Specifications or approved instructions to determine the need to perform Surveillance Instruction (SVI-E12-T2002) "RHR B Pump and Valve Operability test." He was misled when the weekly surveillance schedule did not include "during core alterations" as one of the required modes for completion of the surveillance. As a result, he considered the surveillance not to be necessary during the plant conditions present. Corrective actions taken in response to the October 9, 1990 event included management issuing directives to all licensed control room personnel to consult approved surveillance instructions when evaluating Technical Specification applicability

conditions, and modification of Plant Administrative Procedure (PAP-1105), "Surveillance Test Control", to procedurally require the Unit Supervisor to perform a review of a controlled copy of the surveillance if a test is not to be performed as scheduled.

VI. Corrective Action

Corrective actions taken in response to this event included counseling the Unit Supervisor with respect to the requirement for procedural compliance. Additionally, as part of the established requalification training program, all plant licensed operators will be instructed on the lessons learned from this event.

Energy Industry Identification System Codes are identified in the text as [XX].