



Commonwealth Edison
Braidwood Nuclear Power Station
Route #1, Box 84
Braceville, Illinois 60407
Telephone 815/458-2801

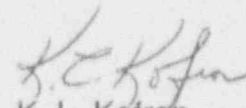
November 6, 1992
BW/92-0567

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

Dear Sir:

The enclosed Licensee Event Report from Braidwood Generating Station is being transmitted to you with the requirement of 10CFR50.73(a)(2)(i)(B) which requires a 30-day written report.

This report is number 92-011-00, Docket No. 50-456.


K. L. Kofron
Station Manager
Braidwood Station

KLK/AJS/dla
655/ZD85G

cc: NRC Region III Administrator
NRC Resident Inspector
INPO Record Center
CECo Distribution List

Encl: Licensee Event Report No. 92-011-00

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LICENSEE EVENT REPORT (LER)																										
Facility Name (1) Braidwood 1										Docket Number (2) 0150004561 of 01					Page (3) 1											
Title (4) Inadequate Testing Frequency for Auxiliary Feedwater Pump Start on Reactor Coolant Pump Bus Undervoltage																										
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)															
11	0	01	7	9	2	9	2	0	1	1	0	1	0	2	6	9	2	Braidwood 2	0	5	0	0	0	4	5	7
OPERATING MODE(9)				6				THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)																		
POWER LEVEL (10) 0 0 0 ///////// /////////				20.402(b)		20.405(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)(vii)		Other (Specify in Abstract below and in Text)																
				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 D. Ibrahim, Technical Staff										Ext. 2402																
										TELEPHONE NUMBER AREA CODE 815 45812801																
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																										
CAUSE	SYSTEM	COMPONENT	MANUFAC-	REPORTABLE	////////	CAUSE	SYSTEM	COMPONENT	MANUFAC-	REPORTABLE	////////	CAUSE	SYSTEM	COMPONENT	MANUFAC-	REPORTABLE	////////									
			TURER	TO NRPDS	////////				TURER	TO NRPDS	////////				TURER	TO NRPDS	////////									
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)																										

As a result of the Byron/Braidwood Auxiliary Feedwater (AF) System Task Force, a review of Byron and Braidwood surveillance procedures was undertaken to identify any differences in testing methodologies. The major difference that was identified was the method of starting the AF pumps for their monthly surveillance runs. The AF pumps at Braidwood are started manually while the AF pumps at Byron are started automatically on a simulated reactor coolant pump (RCP) bus undervoltage signal. The Braidwood procedure satisfies one Technical Specification Surveillance Requirement (TSSR) while the Byron procedure satisfies two TSSRs. The additional TSSR satisfied by the Byron procedure is a monthly Trip Actuating Device Operational Test (TADOT) of the AF pump start on an RCP bus undervoltage signal. A review of Braidwood surveillance procedure identified as satisfying that TADOT requirement does not satisfy the definition of a TADOT which requires the Trip Actuating Device to be operated. The functionality of this TADOT has been demonstrated quarterly by a Slave Relay Surveillance required by another TSSR. The root cause of this event is a procedural deficiency. There have been similar occurrences of missed TSSRs as a result of procedural deficiencies. The causes and corrective actions from the previous events are not applicable to this event.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)						Page (3)		
Braidwood 1	0 1 5 1 0 1 0 1 4 5 6	Year	///	Sequential	///	Revision	///			
		Number	///	Number	///	Number	///			
TEXT	Energy Industry Identification System (EIS) codes are identified in the text as [XX]	9 1 2	-	0 1 1 1	-	0 0 0		0 1 2	OF	0 1 3

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: Braidwood 1; Event Date: October 07, 1992; Event Time: 0800
 Mode: 6 - Refueling; Rx Power: 000%;
 RCS [AB] Temperature/Pressure Ambient / 0 psig;

Unit: Braidwood 2; Event Date: October 07, 1992; Event Time: 0800
 Mode: 1 - Power Operation; Rx Power: 099%;
 RCS [AB] Temperature/Pressure NOT / NOP;

B. DESCRIPTION OF EVENT:

As a result of the Byron/Braidwood Auxiliary Feedwater (AF) System Task Force, a review of Byron and Braidwood surveillance procedures was undertaken to identify any differences in testing methodologies. The major difference that was identified was the method of starting the AF pumps for their monthly surveillance runs. Braidwood Technical Surveillance Procedure (BWVS) 7.1.2.1.a-1, Motor Driven Auxiliary Feedwater Pump Monthly Surveillance, and BWVS 7.1.2.1.a-2, Diesel Driven Auxiliary Feedwater Pump Monthly Surveillance, direct that the AF pumps be started manually. The corresponding Byron Technical Surveillance Procedures direct the AF pumps to start automatically on a simulated reactor coolant pump (RCP) bus undervoltage signal.

The Byron procedures were written to satisfy the monthly Trip Actuating Device Operational Test (TADOT) requirement of Technical Specification Surveillance Requirement (TSSR) 4.3.2.1, Table 4.3-2, Functional Unit (FU) 6.d and TSSR 4.7.1.2.1.a.1. BWVS 7.1.2.1.a-1 and BWVS 7.1.2.1.a-2 were written to satisfy TSSR 4.7.1.2.1.a.1 only.

A review of Braidwood surveillance procedures identified BWVS 3.1.1-7, Reactor Coolant Pump Bus Undervoltage Monthly Surveillance, as the only procedure performed to satisfy the requirements of TSSR 4.3.2.1, Table 4.3-2, FU 6.d. This procedure does not satisfy Specification 1.36, the definition of a TADOT, which requires the Trip Actuating Device to be operated.

The quarterly Slave Relay Test requirement of TSSR 4.3.2.1, Table 4.3-2, FU 6.b does satisfy the TADOT requirement of TSSR 4.3.2.1, Table 4.3-2, FU 6.d. Performance of Braidwood Unit 1(2) Operating Surveillance Procedures (1(2))BWVS 3.2.1-940, Unit One (Two) ESFAS Instrumentation Slave Relay Surveillance (Train A Auxiliary Feedwater Actuation-K632, K639), and 1(2)BWVS 3.2.1-950, Unit One (Two) ESFAS Instrumentation Slave Relay Surveillance (Train B Auxiliary Feedwater Actuation-K632, K639), has been increased from quarterly to monthly in the General Surveillance Program (GSRV) in order to satisfy the monthly TADOT requirement of TSSR 4.3.2.1, Table 4.3-2, FU 6.d.

This event is being reported pursuant to 10CFR50.73(a)(2)(i)(B) - any operation or condition prohibited by the plant's Technical Specifications.

C. CAUSE OF EVENT:

The root cause of this event was a procedural deficiency. 1(2)BWVS 3.1.1-7 was written to satisfy the quarterly TADOT requirement of TSSR 4.3.1.1, Table 4.3-1, FU 15. The surveillance frequency was increased to monthly to satisfy both the quarterly TADOT requirement of TSSR 4.3.1.1, Table 4.3-1, FU 15 and the monthly TADOT requirement of TSSR 4.3.2.1, Table 4.3-1, FU 6.d. It was not recognized that the Trip Actuating Device required to be operated to satisfy the TADOT requirement of TSSR 4.3.2.1, Table 4.3-2, FU 6.d was not the same as the Trip Actuating Device being operated to satisfy the TADOT requirement of TSSR 4.3.1.1, Table 4.3-1, FU 15.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		Year	///	Sequential	///	Revision				
			///	Number	///	Number				
Braidwood 1	0 1 5 1 0 1 0 1 4 5 6	9 2	-	0 1 1	-	0 0	0 3	OF	0 3	
TEXT Energy Industry Identification System (EIIIS) codes are identified in the text as [XX]										

D. SAFETY ANALYSIS:

This event had no effect on plant or public safety. The equipment was always operable and capable of performing its design function. The functionality of the TADOT requirement was always demonstrated by the quarterly slave relay surveillance.

The worst case condition is a loss of offsite power from 100% Reactor Power in conjunction with a loss of coolant accident. The redundant function is an automatic start of the Auxiliary Feedwater Pumps on 10-2 steam generator level.

E. CORRECTIVE ACTIONS:

Increase the frequency of operating surveillances 1(2)BWOS 3.2.1-940, Unit One (Two) ESFAS Instrumentation Slave Relay Surveillance (Train A Auxiliary Feedwater Actuation - K632, K639), and 1(2)BWOS 3.2.1-950, Unit One (Two) ESFAS Instrument Slave Relay Surveillance (Train B Auxiliary Feedwater Actuation - K632, K639), from quarterly to monthly. These surveillances satisfy the TADOT requirement of TSSR 4.3.2.1, Table 4.3-2, FU 6.d.

F. PREVIOUS OCCURRENCES:

There have been similar occurrences of missed Technical Specification requirements as a result of procedural deficiencies. The causes and corrective actions from the previous events are not applicable to this event. The previous involved requirements that were missed altogether or as a result of Technical Specification changes.

G. COMPONENT FAILURE DATA:

This event was not the result of component failure, nor did any components fail as a result of this event.