

LICENSEE EVENT REPORT (LER)

APPROVED ONE NO. 3180-0104
EXPIRES - 8/31/85

FACILITY NAME (1)

Limerick Generating Station - Unit 1

DOCKET NUMBER (2)

0 5 0 0 0 3 5 2 1 OF 0 4

PAGE (3)

TITLE (4)

License Condition Regarding Safety Parameter Display System Operability

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 (9)		
04	01	85	85	045	00	05	01	85		0 5 0 0 0 1 1		
										0 5 0 0 0 1 1		
OPERATING MODE (10)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)									
4												
POWER LEVEL (10)			20.402(b)			20.406(a)			00.73(a)(2)(iv)			73.71(b)
0.00			20.406(a)(1)(i)			00.36(a)(1)			00.73(a)(2)(v)			73.71(c)
			20.406(a)(1)(ii)			00.36(a)(2)			00.73(a)(2)(vi)			<input checked="" type="checkbox"/> OTHER (Specify in Abstract below and in Title, NRC Form 306A)
			20.406(a)(1)(iii)			00.73(a)(2)(i)			00.73(a)(2)(vii)(A)			NPF-27,
			20.406(a)(1)(iv)			00.73(a)(2)(ii)			00.73(a)(2)(viii)(B)			Condition 2.F
			20.406(a)(1)(v)			00.73(a)(2)(iii)			00.73(a)(2)(ix)			

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
John C. Nagle, Engineer	AREA CODE 2 1 5 8 4 1 - 5 1 8 4

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)

YES (If you complete EXPECTED SUBMISSION DATE)	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input type="checkbox"/>	<input type="checkbox"/>				

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

Abstract: 85-045

License Condition 2.C.8.(b), requiring Safety Parameter Display System (SPDS) operability by April 1, 1985, was not met because the SPDS validation process is incomplete. The final tests involved in the validation process require plant power levels up to and including 100 percent of full power. Because of the limits of the 5 percent power license, the SPDS validation testing required to release the SPDS for operator use is not complete.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMR NO. 3150-0104
EXPIRES 8/31/85

FACILITY NAME (1) Limerick Generating Station Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 3 5 2 8 5	LER NUMBER (3)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		0 4 5	0 1 0	0 2	OF	0 4	

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

Description of the Event:

Limerick Generating Station License Condition 2.C.8.(b) requires that the Safety Parameter Display System (SPDS) be made operable by April 1, 1985. The SPDS, as described in Section 18.2 of NUREG-0991, SER Supplement 3, was not fully operable by April 1, 1985 because the SPDS validation process, which must be completed prior to releasing the SPDS for use by the Control Room operators, is not complete. (The SPDS validation process was reviewed and approved in Section 18.2.7 of NUREG-0991, SER Supplement 3.) The final activities in the SPDS validation process require plant power levels up to and including 100 percent of full power. These activities involve testing the parameter validation algorithms and composed point logic at defined plant power levels during the Power Ascension Test Program. Therefore, the SPDS is not considered to be fully operable at this time because the limit of the 5 percent power license has made the completion of the necessary SPDS validation testing impossible.

Consequences of Event:

The delay in availability of the SPDS presents no significant compromise in plant safety for the following considerations:

The Radioactivity Control Critical Safety Function of the SPDS is presently operable and available for operator use.

Procedures have been developed in parallel with the SPDS, which describe the timely and correct safety status assessment of the plant when the SPDS is not available (Transient Response Implementation Plan, or TRIP procedures). The safety status of the plant can be assessed from the parameters which constitute the entry conditions into these procedures.

The operators have been thoroughly trained to respond to accident conditions without the SPDS available. Limerick operators have been taught to cope with severe transients using the TRIP's in conjunction with Regulatory Guide 1.97 instrumentation without the benefit of SPDS.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104
EXPIRES 8/31/85

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

TEXT (If more space is required, use additional NRC Form 3694's) (17)

Further, all of the parameters presented on the SPDS displays are presently available in the Control Room for operator use via qualified, hardwired indicators. These indicators provide the information that is needed to quickly and reliably assess the safety status of the plant. The operators have been trained in the simulator to respond to transient and emergency conditions without the SPDS being available. Therefore, operator actions are not dependent on the availability of the SPDS displays.

In conclusion, the delay in availability of the SPDS displays involves no unreviewed safety question and no significant hazards considerations.

Corrective Actions:

The failure to meet License Condition 2.C.8.(b) was reported in correspondence from J. S. Kemper to A. Schwencer dated March 18, 1985. Additionally, a proposed change to condition 2.C.8.(b) regarding the completion schedule of the SPDS, was submitted on March 29, 1985. The following preliminary schedule has been proposed. The dates may vary depending on test program results.

Those activities that can be performed independent of plant operating status consist of the following:

<u>Activity</u>	<u>Scheduled Completion</u>
o Installation of Limerick Unique RTAD Composed Points and Constants	5/6/85
o Validate RTAD Constants and Composed Point Data Base	6/1/85
o Simulated Test or Parameter Validation Algorithms	7/15/85
o Prerequisites for Reasonableness Checks at Power Complete	8/1/85
o Resolve Simulated Test Discrepancies	9/2/85

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

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

TEXT (If more space is required, use additional NRC Form 368a) (17)

Those activities which must be performed with the plant at various power levels consist of the following:

- o Test parameter validation algorithms
- o Refine system data constants
- o Perform SPDS reasonableness checks against Control Room indicators.

These activities will be completed prior to declaring the SPDS initially operable in accordance with License Condition 2.C.8.(b). Under the proposed Condition, the SPDS shall be initially operable within 30 days after the completion of the 100-Hour Warranty Run at 100 percent of rated power (3293 MWth).

Previous Similar Occurrences:

None.

PHILADELPHIA ELECTRIC COMPANY

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May 1, 1985

Docket No. 50-352

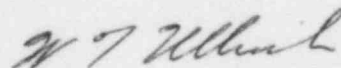
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Washington, DC 20555

SUBJECT: Licensee Event Report
Limerick Generating Station - Unit 1

This LER deals with the failure to meet Limerick Generating Station License NPF-27 Condition 2.C.8.(b), requiring Safety Parameter Display System operability by April 1, 1985. It is submitted pursuant to License Condition 2.F, which requires the submittal of a follow-up report (subsequent to initial notification), written in accordance with 10 CFR 50.73(b), (c), (d), and (e).

Reference:	Docket No. 50-352
Report Number:	85-045
Revision Number:	00
Event Date:	April 1, 1985
Report Date:	May 1, 1985
Facility:	Limerick Generating Station P.O. Box A, Sanatoga, PA 19464

Very truly yours,



W. T. Ullrich
Superintendent
Nuclear Generation Division

cc: Dr. Thomas E. Murley, Administrator, Region I, USNRC
J. T. Wiggins, Senior Site Inspector
See Service List

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cc: Judge Helen F. Hoyt
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Atomic Safety & Licensing Board Panel
Docket & Service Section (3 Copies)
James Wiggins
Timothy R. S. Campbell

January 16, 1985