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Wilfred Connell
Vice President

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2C.220
WC-154-96
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Docket No. 50-461

10CFR50.73

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

Subject: Clinton Power Station - Unit 1
Licensee Event Report No. 96-005-00

Dear Sir:

Enclosed is Licensee Event Report No. 96-005-00: Failure to Follow Procedures During Completion of One-Rod-Out Interlock Test Results in Reactor Mode Switch Not Locked in REFUEL During Control Rod Exercising as Required by Technical Specification. This report is being submitted in accordance with the requirements of 10CFR50.73.

Sincerely yours,

Wilfred Connell
Vice President

RSF/csm

Enclosure

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety
INPO Records Center

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LICENSEE EVENT REPORT (LER)

(See reverse for required number of
digits/characters for each block)ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY
INFORMATION COLLECTION REQUEST: 60.0 HRS. REPORTED LESSONS
LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK
TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE
INFORMATION AND RECORDS MANAGEMENT BRANCH (T-8 F33), U.S.
NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20565-0001, AND
TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF
MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

Clinton Power Station

DOCKET NUMBER (2)

05000461

PAGE (3)

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TITLE (4)

Failure to Follow Procedures During Completion of One-Rod-Out Interlock Test Results in Reactor Mode Switch Not Locked in
REFUEL During Control rod Exercising as Required by Technical Specification

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
04	11	96	96	005	00	05	10	96	None	05000
									FACILITY NAME	DOCKET NUMBER
									None	05000
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)								
3		20.2201(b)			20.2203(a)(2)(v)			X	50.73(a)(2)(i)	50.73(a)(2)(viii)
POWER LEVEL (10)		20.2203(a)(1)			20.2203(a)(3)(i)				50.73(a)(2)(ii)	50.73(a)(2)(x)
000		20.2203(a)(2)(i)			20.2203(a)(3)(ii)				50.73(a)(2)(iii)	73.71
		20.2203(a)(2)(ii)			20.2203(a)(4)				50.73(a)(2)(iv)	OTHER
		20.2203(a)(2)(iii)			50.36(c)(1)				50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
		20.2203(a)(2)(iv)			50.36(c)(2)				50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

R. B. Bedford, Operations Task Coordinator

TELEPHONE NUMBER (Include Area Code)

(217) 935-8881, Extension 3650

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 15 single-spaced typewritten lines) (16)

With the plant in Mode 3 (HOT SHUTDOWN), and control rod exercising in progress, a routine key inventory identified that one of two reactor mode switch keys was not in the shift supervisor's key locker. Questioning about the key led to the discovery that the reactor mode switch was not locked in position as required by the Technical Specification (TS) and implementing procedures. The reactor mode switch was in the REFUEL position but not locked during completion of a surveillance to verify the operability of the interlock that prevents withdrawal of more than one control rod, and during single control rod withdrawal for control rod exercising in Mode 3. Operators locked the switch when the error was discovered. The cause of this event is attributed to failure to follow procedures. An explicit requirement to lock the switch in the REFUEL position when placed in that position during Mode 3 did not exist prior to implementation of the Improved TS. Corrective action for this event requires that Operations shift crews be provided with a copy of the condition report and its disposition for review of this event.

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		96	005	00	

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

DESCRIPTION OF EVENT

On April 11, 1996, the plant was in Mode 3 (HOT SHUTDOWN), reactor [RCT] coolant temperature was about 449 degrees Fahrenheit, and pressure was about 400 pounds per square inch. All reactor control rods were fully inserted into the reactor core, and the reactor mode switch [HS] was in the SHUTDOWN position. At about 1723 hours, the Operations shift crew was briefed on the planned exercising of reactor control rods.

At about 1938 hours, in preparation for starting the exercise, operators performed surveillance procedure CPS 9090.01, "Refueling Interlocks Operability Test/One Rod Out Interlock Operability," to verify operability of the interlock that prevents withdrawal of more than one control rod. During performance of the surveillance, an operator placed the reactor mode switch into the REFUEL position. During completion of the surveillance procedure an operator left the reactor mode switch in the REFUEL position in preparation for the control rod exercising. The surveillance procedure requires that the reactor mode switch be locked in either the SHUTDOWN or REFUEL position; however, the operator did not lock the switch as required by removing the key. (To lock the mode switch, the key must be removed from the switch with the switch in its required position.)

Technical Specification (TS) 3.10.3, "Special Operations-Single Control Rod Withdrawal-Hot Shutdown," allows the reactor mode switch to be placed in the REFUEL position for single control rod withdrawal in Mode 3 provided several conditions are met. One of the conditions required to be met is TS 3.9.2, "Refuel Position One-Rod-Out Interlock." TS 3.9.2 requires that the refuel position one-rod-out interlock shall be operable. In addition, Surveillance Requirement (SR) 3.9.2.1 requires verification at 12-hour intervals that the reactor mode switch is locked in the REFUEL position.

At about 2003 hours, operators withdrew the first control rod during the control rod exercising activity.

At about 2400 hours, an Operations shift crew change occurred; the reactor mode switch remained in the REFUEL position.

On April 12, 1996, at about 0035 hours, the oncoming Operations shift crew was briefed for continuing the control rod exercising activity, and at 0037 hours, the exercising recommenced.

At about 0550 hours, during a routine shift inventory of the shift supervisor's controlled key locker in accordance with Operations procedure CPS 1401.01F002, "Shift Turnover and Relief-Status Report," a generating station clerk questioned the absence of one of two reactor mode switch keys. This questioning led to the shift crew determining that the reactor mode switch had not been locked in the REFUEL position during completion of surveillance CPS 9090.01 and during control rod exercising as required by the surveillance procedure and Technical Specifications. Additionally, integrated operating procedure checklist CPS 3006.01C007, "Control Rod Withdrawal Checklist-Mode 3," requires verification by each shift that the reactor mode switch is locked in the REFUEL position.

At about 0552 hours, operators removed the reactor mode switch key to lock the switch in the REFUEL position.

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

Therefore, TS 3.10.3 and TS 3.9.2 were not met during the control rod exercising activity performed from 2003 hours on April 11 through 0552 hours on April 12, 1996. Condition Report (CR) 1-96-04-027 was initiated to track a cause and corrective action determination.

No automatic or manually initiated safety system responses were necessary to place the plant in a safe and stable condition. No equipment or components were inoperable at the start of this event to the extent that their inoperable condition contributed to this event.

CAUSE OF EVENT

The cause of this event is attributed to personnel error as a result of failure to follow procedures. Prior to the implementation of the Improved Technical Specifications, on January 1, 1995, the TS did not explicitly require the reactor mode switch to be locked in the REFUEL position for control rod exercising in Mode 3. For this reason, operations personnel felt that locking the reactor mode switch by removing the mode switch key was applicable only for Mode 5 (REFUELING).

CORRECTIVE ACTION

Operations shift crews will be provided a copy of the condition report and its disposition for review so they are aware of the error made in this event.

ANALYSIS OF EVENT

This event is reportable under the provisions of 10CFR50.73(a)(2)(i)(B) because the reactor mode switch was not locked in the REFUEL position as required by the Technical Specifications.

An assessment of the safety consequences and implications of this event indicates that this event was not nuclear safety significant. Prior to this event, operators verified that all reactor control rods were fully inserted into the reactor core, the reactor mode switch was in the REFUEL position, and the reactor mode switch REFUEL position interlock was operable to prevent withdrawal of more than one control rod.

The reactor mode switch was not locked as required in the REFUEL position from 2003 hours on April 11 to 0552 hours on April 12, 1996. The failure to lock the reactor mode switch in the REFUEL position was discovered at about 0550 hours on April 12, 1996, and locked at 0552 hours.

ADDITIONAL INFORMATION

No equipment or components failed during this event.

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CPS has not reported similar events in recent history regarding failure to lock the reactor mode switch.

For further information regarding this event, contact R. B. Bedford, Operations Task Coordinator, at (217) 935-8881, extension 3650.