

LICENSEE EVENT REPORT (LER)															Form Rev. 2.0															
Facility Name (1) Quad Cities Unit One										Docket Number (2) 0 5 0 0 0 2 5 4					Page (3) 1 of 0 5															
Steam Line Radiation Monitor functional test not performed within frequency established for Technical Specification when in Refueling mode due to incomplete documentation of a Technical Specification Interpretation																														
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(s)																				
0	9	0	4	9	6	9	6	--	0	1	9	--	0	0	1	0	0	4	9	6	0 5 0 0 0 0 5 0 0 0									
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)																											
POWER LEVEL (10)			2		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																			
					20.405(a)(1)(iii)		X 50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		in Abstract																			
					20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)		below and in																			
					20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)		Text)																			
LICENSEE CONTACT FOR THIS LER (12)																														
NAME Charles Peterson, Regulatory Affairs Manager, ext. 3602										TELEPHONE NUMBER																				
										AREA CODE 3 0 9 6 5 4 - 2 2 4 1																				
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)																				
YES (If yes, complete EXPECTED SUBMISSION DATE)										X NO																				
ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)																														

ABSTRACT:

During a review by the station of Technical Specification Interpretations (TSI), as a result of a recent Zion Generating Station issue, it was determined that QCIS 1700-01, "Weekly Main Steam Line Radiation Monitor [RT] Functional Test", had not been performed when required on several occasions dating back to a TSI (dated 10/05/92). The root cause of this event is the incomplete documentation of the 10/05/92 TSI. The immediate corrective action was for Operations to verify QCIS 1700-01 was current for both Units. On 09/23/96, Quad Cities Station implemented Amendment 171 to Docket number 50-254 and Amendment 167 to Docket number 50-265. These Amendments put in place revised Technical Specifications (TS) which eliminated all TSIs, including the earlier referenced TSI. These new TSs provide clearer operability requirements as well as mode specific surveillance requirements. Also on 09/23/96, QCOS 0500-09, "Transitioning from No Mode (All Fuel Removed) to Mode 5", was implemented providing the Operations Department with the means to ensure all Technical Specification requirements including surveillances, are satisfied prior to transferring to the REFUEL Mode. A review was conducted of other similarly denoted surveillances listed on the TSI and no further problems were identified.

A change will be made to QCAP 2300-11, "Technical Specification Clarification Request," to require all future Clarification Requests be approved by the Plant Operations Review Committee. (NTS# 254-180-96-01901)

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Year		Sequential Number	Revision Number										
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TEXT Energy Industry Identification System (EIIIS) codes are identified in the text as [XX]

PLANT AND SYSTEM IDENTIFICATION:

General Electric - Boiling Water Reactor - 2511 MWt rated core thermal power.

EVENT IDENTIFICATION:

Unit: One Event Date: 09/04/96 Event Time: 2400
Reactor Mode: 2 Mode Name: Startup Power Level: 8%

A. CONDITIONS PRIOR TO EVENT:

This report was initiated by Licensee Event Report LER254\96-019.

Startup (2) - Mode switch in Startup/Hot Standby position with average reactor coolant temperature at any temperature.

B. DESCRIPTION OF EVENT:

On 09/04/96, Unit One (U1) was in the STARTUP Mode operating at 8% of rated core thermal power. During a review by the Station of Technical Specification Interpretations (TSI) as a result of a recent Zion Generating Station issue, it was determined that QCIS 1700-01, "Weekly Main Steam Line Radiation Monitor [RT] Functional Test", had not been performed when required during the Unit 1 refueling outage Q1R14. Further investigation from the time the TSI (dated 10/05/92) was approved to the present uncovered the following missed TS surveillances.

On 10/05/92, a Technical Specification Interpretation (TSI) request titled "Surveillance Requirements Not Applicable During Shutdown" was submitted for approval by the Instrument Maintenance (IM) Department. The TSI was to determine if instrumentation that is not required to be operable, because its associated systems or components were inoperable, could have its surveillances suspended during the period when it is not required to be operable. The interpretation included surveillance QCIS 1700-01* as not required during cold shutdown and refueling under a system heading "Reactor Protection System (RPS)[JC]/ Primary Containment Isolation*" (PCI)[JM]. The asterisk denoted that the portions of QCIS 1700-01 which supported Primary Containment Isolation operability were not applicable during shutdown or refueling although a partial surveillance of QCIS 1700-01 would still be required for Reactor Protection System operability as long as there was fuel in the reactor vessel [RCT] and the reactor scram was reset. The definition of the asterisk, however, was never documented in the TSI or associated supporting documentation. Technical Specification Table 4.1-1 requires a weekly functional test of the Main Steam Line Radiation Monitors (MSLRMs) in the REFUEL, STARTUP/HOT STANDBY, and RUN Modes. Since this TSI was approved, the following missed TS surveillances have occurred.

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1. From 11/15/92 until 12/16/92 during the Q1R12 Refuel Outage, QCIS 1700-01 was not performed as required.
2. From 11/02/93 to 11/24/93, during the Q1M09 Maintenance Outage, QCIS 1700-01 was not performed as required.
3. From 12/14/93 to 12/30/93, during the Q1F34 Forced Outage, QCIS 1700-01 was not performed as required.
4. From 06/24/94 to 07/29/94, during the Q1R13 Refuel Outage, QCIS 1700-01 was not performed as required.
5. From 02/08/96 to 02/26/96, and from 04/19/96 to 04/30/96 during the Q1R14 Refuel Outage, QCIS 1700-01 was not performed as required.

C. APPARENT CAUSE OF EVENT:

The root cause of these events is the incomplete documentation of the 10/05/92 TSI (On Site Review 92-40). The TSI preparer did not document the meaning of the asterisk as it applied to the RPS and PCI functions. The asterisk was intended to denote that the positions of QCIS 1700-01 which supported Primary Containment Isolation operability were not applicable during shutdown or refueling although a partial surveillance of QCIS 1700-01 would still be required for Reactor Protection System operability as long as there was fuel in the reactor vessel and the reactor scram was reset. The IM Department used the TSI as justification to suspend performance of QCIS 1700-01 during outages. This basis was documented on QAP 0500-S9 and QAP 2000-11 Attachment A each outage. In all cases the surveillance was deferred to prior to startup. These were approved by a Department Supervisor, a System Engineer, and an Operating Engineer. None of these reviews uncovered the errors. For the Q1R12, Q1R13, and Q1R14 refuel outages, the surveillance was missed prior to core reload and for a period of time after reload. For the Q1M09 and Q1F34 outages, the surveillance was suspended for the entire outage. Also, during the Q1R14 outage, the surveillance was erroneously suspended for 18 days prior to full core offload. In all cases, however, the surveillance was completed prior to reactor startup.

A contributing factor to this event is the lack of a critical review of QAP 0500-S9 and QAP 2000-11, Attachment A. During the approval process, each inadequate outage deferral could have been identified by the reviewers.

D. SAFETY ANALYSIS OF EVENT:

The function of the MSLRMs is to detect high radiation in the main steam line area and effect mitigating actions to limit possible releases to the plant and ultimately, the environment. During the missed TS surveillances, the Main Steam Isolation Valves (MSIVs) were closed. Also, the reactor was subcritical during all periods when QCIS 1700-01 was delinquent. Therefore, the safety significance of this event is minimal.

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Had the MSLRMs been inoperable during a worst case design basis fuel handling accident (DBFHA), no increases to the consequences of the accident would occur. The DBFHA utilizes the Reactor Building Ventilation and Fuel Pool Radiation Monitoring System to mitigate the consequences of the accident. The MSLRMs are not utilized in the Updated Final Safety Analysis (UFSAR) in this particular accident analysis. In all of the incidents, the Main Steam Isolation Valves (MSIVs) were closed (and main steam line plugs installed during refueling outages only) to prevent filling the main steam lines during reactor flooding. These closed MSIVs prevent exposing reactor coolant to the MSLRM detectors.

E. CORRECTIVE ACTIONS:

Corrective Actions Completed:

1. Operations immediately verified QCIS 1700-01 was current for both Units.
2. On 09/23/96, Quad Cities Station implemented Amendment 171 to Docket number 50-254 and Amendment 167 to Docket number 50-265. These Amendments put in place revised TSs and eliminated all TSIs, including the earlier referenced TSI. The new TSs provide clearer operability requirements and more specific surveillance requirements. Specifically, surveillances for the MSLRMs are required in Modes 1, 2, and 3 only. Therefore, the ambiguity brought on by the TSI has been eliminated and surveillances will be performed based on clearly defined plant modes.
3. On 09/23/96, QCOS 0500-09 was implemented providing the Operations Department with the means to ensure all TS requirements including the surveillances, are satisfied prior to transferring to the REFUEL Mode.
4. A review of compliance was conducted of other similarly denoted surveillances listed on the TSI. No violations were identified during the review.

Corrective Actions to be Completed

1. A change will be made to QCAP 2300-11, "Technical Specification Clarification Request," to require all future Clarification Requests be approved by the Plant Operations Review Committee. (NTS# 254-180-96-01901). This item will be completed by December 1, 1996.

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F. PREVIOUS EVENTS:

A search for LERs in the last 2 years involving missed TS surveillances revealed the following events:

- 11/07/94 LER 254/94-14, Fire system surveillance went past their critical due date without the systems being declared inoperable and compensatory actions put in place due to inadequate training and written communication.
- 11/05/95 LER 254/95-06, The RPS EPA relays had not been tested prior to the mode switch being moved to Refuel due to an inadequate written communication.

The primary cause of these previous events was inadequate procedural guidance. In this event the appropriate data was available but not used.

G. COMPONENT FAILURE DATA:

There were no component failures in this event.