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LWP-96-070

September 26, 1996

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Reference: Quad Cities Nuclear Power Station
Docket Number 50-254, DPR-29, Unit One

Enclosed is Licensee Event Report (LER) 96-018, Revision 00, for Quad Cities Nuclear Power Station.

This report is submitted as a voluntary report only.

There are no commitments being made by this LER.

If there are any questions or comments concerning this letter, please refer them to Charles Peterson, Regulatory Affairs Manager at 309-654-2241, ext. 3602.

Respectfully,

COMMONWEALTH EDISON COMPANY
QUAD CITIES NUCLEAR POWER STATION

L. W. Pearce
Station Manager

LWP/NC/plm

Enclosure

cc: A. B. Beach, Regional Administrator, Region III
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LICENSEE EVENT REPORT (LER) Form Rev. 2.0

Facility Name (1)	Docket Number (2)	Page (3)
Quad Cities Unit One	0 5 0 0 0 2 5 4	1 of 0 5

Title (4)

Technical Specification Surveillance Requirements were misinterpreted due to a conservative misunderstanding of the requirement.

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)
0 9	0 3	9 6	9 6	-- 0 1 8	-- 0 0	0 9	2 6	9 6		0 5 0 0 0
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OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)				
2		20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)	
POWER LEVEL (10)	0 0 9	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)	X	Other (Specify in Abstract below and in Text)
		20.405(a)(1)(iii)	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
Charles Peterson, Regulatory Affairs Manager, Ext. 3602	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)	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)

ABSTRACT:

On September 3, 1996, Operating and Regulatory Assurance Management conservatively concluded that a Technical Specification required surveillance had been missed on Unit 1. Believing that the Technical Specification surveillance and action requirement had been missed, the station met the Generating Station Emergency Plan (GSEP) Unusual Event (UE) criteria on September 3, 1996. The UE was declared and terminated on September 4, 1996, at 1325 hours.

During investigation of this event, it was determined that no required Technical Specification surveillances were missed. On September 17, 1996 a notification was made to retract the Emergency Notification System (ENS) call made on September 4, 1996. A voluntary Licensee Event Report (LER) is being submitted to report this event. The cause of the event was that wrong assumptions were made. Operating and Regulatory Assurance Management's determination, that additional testing needed to be performed, was conservative, although technically incorrect.

This event had no safety significance because no Technical Specification surveillance intervals were exceeded. All crews have been instructed on the surveillance requirements that must be completed prior to moving the Reactor mode switch from Run to Startup. This was an interim measure until the Technical Specification Upgrade Program (TSUP) was implemented on September 23, 1996. The upgraded Technical Specifications clearly define the required functional tests and calibrations.

PLANT AND SYSTEM IDENTIFICATION:
General Electric - Boiling Water Reactor - 2511 MWt rated core thermal power.

EVENT IDENTIFICATION: Technical Specification Surveillance Requirements were misinterpreted due to a conservative misunderstanding of the requirement.

A. CONDITIONS PRIOR TO EVENT:

Unit: One Event Date: September 3, 1996 Event Time: 1000
Reactor Mode: 2 Mode Name: Startup Power Level: 9%

This report was initiated by Licensee Event Report LER254\96-018.

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

B. DESCRIPTION OF EVENT:

On September 2, 1996, at 1242 hours, the Unit 1 Reactor mode switch [JC] was moved from Run into Startup with the Reactor at approximately 8% power. All Technical Specification surveillance requirements were met.

On September 3, 1996, at 1000 hours, the Shift Engineer (SE) reviewed procedure QCIPM 0100-01, DOCUMENTATION OF INSTRUMENT DEPARTMENT WEEKLY CHECKS, to verify that all required nuclear instrumentation [IG] surveillances had been completed prior to moving the Reactor mode switch back into Run. The procedure's purpose section stated: "The purpose of this procedure is to provide instructions for the documentation of Instrument Department calibrations and functional tests that are required by Technical Specifications to be performed weekly." From this procedure and Technical Specification table 3.1-2, REACTOR PROTECTION SYSTEM (SCRAM) REQUIREMENTS IN STARTUP/HOT STANDBY MODE, the SE conservatively concluded that QCIS 0700-09, PRIOR TO STARTUP NEUTRON MONITORING FUNCTIONAL TEST, was the appropriate weekly surveillance with the Reactor mode switch in Startup. Step F.2. of QCIS 0700-09 stated: "(Technical Specification) Calibration/functional test shall be performed within seven days of each startup (Reactor mode switch in Refuel or Startup position)."

The SE discussed his understanding of the requirements with an Instrument Maintenance Department (IMD) work scheduler, who agreed with the conclusion. They checked the date that this surveillance had last been performed and discovered that the surveillance interval was greater than one week. The last time this surveillance had been performed was when the Reactor mode switch was moved from Run into Startup on September 2, 1996. The SE directed the IMD to begin performing the surveillance since he felt it was necessary to meet the Technical Specification surveillance requirement. The SE discussed his conclusion with other Operating Management and Regulatory Assurance Management, who agreed that these surveillances should have been performed prior to moving the Reactor mode switch from Run into Startup on September 2.

The SE then referred to NRC Generic Letter 87-09 which includes a discussion of unnecessary shutdowns when surveillance intervals are inadvertently exceeded. He asked other Operating Management and Regulatory Assurance Management to review the Generic Letter. They believed the Generic Letter provided the accepted methodology on how to deal with a missed Technical Specification surveillance. They determined the NRC allowed an additional 24 hours after discovery to perform the required missed surveillances when the allowable outage times of the action requirements are less than 24 hours or when shutdown action requirements apply. The action required by Technical Specification table 3.1-2 is: "Initiate insertion of operable rods and complete insertion of all operable rods within 4 hours." On September 3, 1996, at 1906 hours, the IMD completed the surveillances necessary to satisfy the SE that all requirements had been met for the Startup mode.

On September 4, 1996, it was determined that the NRC only allows the additional 24 hours if that statement is incorporated into the station's Technical Specifications. At that time, this statement had not been incorporated into the Technical Specifications. It has since been incorporated into the Technical Specification Upgrade Program (TSUP) implemented on September, 23 1996. Therefore, believing that the Technical Specification surveillance had been missed, insertion of all operable rods should have been completed by 1400 hours on September 3, 1996.

Not having the rods inserted in the required time, met the Generating Station Emergency Plan (GSEP) Emergency Action Level (EAL) MU-10 (Unusual Event) criteria: "Technical Specification time limit expired" from 1400 hours (four hours after identification) until 1906 hours (surveillance completion) on September 3, 1996. The Unusual Event (UE) was declared and terminated on September 4, 1996, at 1325 hours. An Event Notification System (ENS) call for the UE was made at 1355 hours.

During the investigation of this event, it was determined that no required Technical Specification surveillances were missed. The SCRAM and rod block surveillances that were not performed within 7 days preceding Unit 1 entering the Startup mode were only required to be performed prior to startup. Because the Startup mode was entered from Run mode, the surveillances were not required. On September 17, 1996, at 1013 hours, an ENS call was made to retract the phone call made at 1355 hours on September 4, 1996.

The Average Power Range Monitor (APRM) upscale (12/125 of scale) rod block was not listed in the Technical Specification table of calibration frequency for rod blocks. The two calibration frequencies listed for all of the other nuclear instrumentation rod blocks are once per month or before each startup. The APRM upscale surveillance was completed prior to startup, two days earlier. Therefore, it met both of the nuclear instrumentation rod block surveillance options.

C. CAUSE OF THE EVENT:

A voluntary Licensee Event Report (LER) is being submitted to report this event. No Technical Specification surveillance intervals were exceeded.

The initiating cause of this event was that wrong assumptions were made. Operating and Regulatory Assurance Management's determination that additional testing needed to be performed was conservative, although technically incorrect, because the surveillances were not required. The nuclear instruments that were required to be operable in Startup, but not in Run, had not been tested within the last 7 days, as the station's procedure required if the unit had continuously stayed in Startup. However, the minimum frequency for functional testing and calibration of the instruments, according to the Technical Specification tables, is before each startup.

D. SAFETY ANALYSIS:

This event had no safety significance because no Technical Specification surveillance intervals were exceeded.

E. CORRECTIVE ACTIONS COMPLETED:

A memorandum was written to explain which minimum Technical Specification surveillances must be performed prior to moving the Reactor mode switch from Run to Startup. It also directed the shift to perform two additional surveillances after moving the mode switch to be conservative. This was an interim measure in place until TSUP was implemented on September 23, 1996.

An entry was made in the operations Daily Order Book that included in part: "All crews should review events leading up to the GSEP UE. When we find surveillances that are overdue beyond their grace period-the equipment is INOP and you must follow the Technical Specification Action Statement unless you make the component operable before the Action Statement time clock expires. We are not permitted to use NRC Generic letter 87-09 and its associated 24 hour clock because this station did not incorporate it into our Technical Specification. Note that when TSUP is implemented, it does make allowances for this."

The station implemented TSUP on September 23, 1996. The upgraded Technical Specifications clearly define the required functional tests and calibrations, including the APRM upscale rod block calibration frequency.

F. **PREVIOUS OCCURRENCES:**

A review of previous Licensee Event Reports at Quad Cities Station Units One and Two, since September, 1993 was performed. The search revealed no previous events where the station used an additional 24 hours after discovery to perform the required missed surveillance.

G. **COMPONENT FAILURE DATA:**

Not Applicable