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Zion Generating Station
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October 30, 1996

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

The enclosed Licensee Event Report number 96-007-00, Docket No. 50-304/DPR-48 from Zion Generating Station is being transmitted to you pursuant to 10 CFR 50.73(a)(2)(i)(B) which requires a thirty-day written report when any event or condition occurs that is prohibited by the plant's Technical Specifications.

Very truly yours,


G. K. Schwartz
Station Manager
Zion Generating Station

Enclosure: Licensee Event Report

cc: NRC Region III Administrator
NRC Resident Inspector
IDNS Resident Inspector
INPO Record Center
Illinois Department of Nuclear Safety
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IE221

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LICENSEE EVENT REPORT (LER)

FACILITY NAME ZION NUCLEAR POWER STATION UNIT 2	DOCKET NUMBER 0 5 0 0 0 3 0 4	PAGE 1 OF 0 4
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TITLE
TECHNICAL SPECIFICATION ACTION STATEMENT NOT PERFORMED WITHIN ALLOWABLE TIME FRAME AS A RESULT OF MANAGEMENT DEFICIENCY

EVENT DATE			LER NUMBER			REPORT DATE			OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQ. NUMBER	REVISION	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
0 9	3 0	9 6	9 6	- 0 0 7	- 0 0	1 0	3 0	9 6		

OPERATING MODE 6		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (CHECK ONE OR MORE OF THE FOLLOWING)			
		20.402(b)	20.405(e)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL 0 0 0		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, NRC Form 366A)
	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

NAME N. M. Brennan, Regulatory Assurance, ext. 2380	TELEPHONE NUMBER 8 4 7 7 4 6 - 2 0 8 4
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED				EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
<input type="checkbox"/> YES, (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO							

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

On September 30, 1996, Operations Management reviewed documentation of Periodic Test (PT)-O, Appendix J-1's, "Normal and Reserve Offsite AC Power Availability." The review of the PT-O, Appendix J-1s was in response to questions from the Nuclear Regulatory Commission Resident Inspector. Operations Management discovered several instances where a Diesel Generator (DG) was inoperable on Unit 2 and PT-O Appendix J-1s were not completed within the required eight-hour interval. Limiting Condition of Operation (LCO) 3.15.2.C is repeated as Surveillance Requirement 4.15.2.C, i.e., provides the availability of the two sources of offsite power within one hour and at least once per eight hours thereafter. Licensed Shift personnel inappropriately relied on the provisions of Technical Specification General LCO Surveillance Requirement (SR) 4.0.2 which provides a 25% extension of the specified surveillance interval for Surveillance Requirements.

The cause of this event is management deficiency. This event was the result of cognitive errors by licensed operators because of their incorrect understanding and application of grace interval to a surveillance period when the surveillance is associated with an action statement. Further investigation revealed a lack of training addressing this condition.

Immediate corrective actions included informing Licensed Shift personnel that the extension associated with Surveillance Requirement 4.0.2 is not applicable to action requirements and providing follow-up training to all the Licensed Shift personnel to correct the LCO/SR knowledge deficiency. Long-term corrective actions include training appropriate individuals and reviewing applicable procedures to ensure grace periods are not applied to LCO action statements.

The safety significance of this event is minimal.

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TEXT Energy Industry Identification System (EIS) codes are identified in the text as [XX]

A. PLANT CONDITIONS PRIOR TO EVENT

Unit 2 MODE 6 - Refueling Rx Power 0% RCS [AB] Temperature/Pressure 88 degrees F / atmospheric

B. DESCRIPTION OF EVENT

The Zion Station Diesel Generators (DG) [EK] are designed to start upon demand and supply power to the associated Engineered Safety Features (ESF) busses. If a DG is inoperable, Technical Specification Limiting Condition of Operation (LCO) 3.15.2.C permits unit operation if the two remaining DGs on that unit are operable and two sources of offsite power as described in LCO 3.15.1.A & C are available. Additionally, Technical Specification 3.15.2.C requires proving the availability of the two sources of offsite power within one hour and at least once per eight hours thereafter. Zion Station uses Periodic Test (PT)-O, Appendix J-1, "Normal and Reserve Offsite AC Power Availability," to verify that the requirements of Technical Specification LCO 3.15.2.C are met. Additionally, the completion of PT-O, Appendix J's associated with LCO 3.15.2.C are documented on Periodic Test (PT)-14, "Inoperable Equipment Surveillance Tests," log sheets.

On September 30, 1996, Operations Management reviewed the documentation of Periodic Test-O, Appendix J's associated with DG LCOs, in response to questions from the Nuclear Regulatory Commission Resident Inspector. Operations Management reviewed a series of PT-14s and discovered several instances where a DG was inoperable and PT-O Appendix J-1s were not completed within the required eight-hour interval. These deficiencies indicated a broader issue associated with understanding of required surveillance intervals since there were several instances with multiple personnel involved.

- On August 12, 1996, the 2A DG was inoperable because its room temperature exceeded 115 degrees F. A PT-O, Appendix J-1 was initially completed as required. However, PT-O, Appendix J-1 was completed on August 13, 1996 at 0335 hours and was not completed again until 1140 hours (eight hours and five minutes). Again on August 13, 1996, PT-O, Appendix J-1 was completed at 1905 hours, and was not completed again until 0315 hours on August 14, 1996, 8 hours and 10 minutes later.
- On September 9, 1996, the 2B DG was inoperable because lube oil temperature was greater than 180 degrees F during PT-11. A PT-O, Appendix J-1 was initially completed as required. However, on September 10, 1996, PT-O, Appendix J-1 was completed at 1905 hours and was not completed again until 0315 hours (eight hours and 10 minutes) on September 11, 1996. The next PT-O, Appendix J-1 was not completed until 1205 hours, eight hours and 50 minutes later.
- On September 15, 1996, at 2242 hours, the 2A DG was declared inoperable to clean the Service Water [BI] coolers. A PT-O, Appendix J-1 was initially completed as required. On September 16, 1996, PT-O Appendix J-1, was completed at 0320 hours. However, PT-O, Appendix J-1, was not completed again until 1128 hours, eight hours and eight minutes later. Subsequently, PTO Appendix J-1 was performed at 1830 hours and then at 0250, eight hours and twenty minutes later.

LCO 3.15.2.C is repeated as Surveillance Requirement 4.15.2.C, i.e., proves the availability of the two sources of offsite power within one hour and at least once per eight hours after that. Consequently, Licensed Operators inappropriately applied the provisions of Technical Specification General LCO Surveillance Requirement (SR) 4.0.2. which provides a 25% extension of the specified interval for Surveillance Requirements.

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		0	5	0	0	0	3	0
		9	6	-	0	0	7	
		-	0	0	7	-	0	
		0	0	0	0	0	0	
		0	3	OF	0	4		

TEXT Energy Industry Identification System (EIS) codes are identified in the text as [XX]

C. CAUSE OF EVENT

The cause of this event is management deficiency. This event was the result of cognitive errors by Licensed Operators because of their incorrect understanding and application of grace period to a surveillance interval when the surveillance is associated with an action statement. Licensed Operators did not understand that the 25% grace period does not apply when the LCO requirements of Technical Specification 3.15.2.C are listed as Surveillance Requirement 4.15.2.C. Further investigation revealed a lack of training addressing this condition.

D. SAFETY ANALYSIS

This event is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B) which requires a thirty-day written report when any event or condition occurs that is prohibited by the plant's Technical Specifications.

The Zion Station DGs are designed to start upon demand and supply power to the associated ESF busses. If a DG is inoperable, Technical Specification LCO 3.15.2.C permits unit operation if the two remaining DGs on that unit are operable and two sources of offsite power as described in LCO 3.15.1.A & C are available. Two other sources of offsite power and two other DGs were available to mitigate the effect of a design basis event. Even though the subject surveillances were not completed in the required time frame, the subject surveillances were performed ultimately which indicated that the required power supplies were available. Therefore, the safety significance of the event is minimal.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME	DOCKET NUMBER	LER NUMBER			PAGE																
ZION NUCLEAR POWER STATION UNIT 2		YEAR	SEQ. NUMBER	REVISION																	
		0	5	0				0	0	3	0	4	9	6	-	0	0	7	-	0	0

TEXT Energy Industry Identification System (EIS) codes are identified in the text as [XX]

E. CORRECTIVE ACTIONS

1. Operations informed Licensed Shift personnel that the grace period associated with SR 4.0.2 is not applicable to action requirements.
2. A lesson plan was developed and presented to all Licensed Shift personnel to correct the LCO/SR knowledge deficiency.
3. Non-shift Licensed Operators and non-licensed individuals that implement or interpret Technical Specification surveillance requirements will be briefed on this event by November 29, 1996. (30418096291601)
4. Operations, Chemistry, Radiation Protection, Instrument Maintenance and System Engineering procedures implementing Technical Specification surveillance requirements will be reviewed by April 4, 1997 to ensure grace periods are not applied to LCO action statements. (30418096291602)

F. PREVIOUS EVENTS SEARCH AND ANALYSIS

Two previous events were identified. LER 96-019 (Unit 1), was caused by a management deficiency involving a Zion Radiation Protection procedure incorrectly crediting the General LCO 25% extension to compensatory action statements. In the event described in LER 96-019 there was procedural guidance that generically allowed the use of grace period regardless of the action requirement being listed as a surveillance requirement. Corrective actions involved correcting a Radiation Protection procedure. The corrective actions were focused too narrowly to have precluded recurrence.

LER 96-005 (Unit 2) reported missing a required surveillance during a unit shutdown. While entering Hot Shutdown (Mode 3), the Unit Supervisor, in consultation with a Licensed Shift Supervisor (LSS), incorrectly halted performance of PT-0 Appendix J1 thereby missing a required surveillance. The cause of the missed surveillance was reported as a personnel error, because the Unit Supervisor and the LSS did not reference Technical Specification Interpretation 91-03 which required remaining in Technical Specification 3.15 when in Mode 3. The corrective actions focused on counseling the individuals involved and addressing human performance issues and would not have prevented the event described in this report.

G. COMPONENT FAILURE DATA

None