

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Callaway Plant Unit 1 DOCKET NUMBER (2) 0 5 0 0 0 4 8 3 PAGE (3) 1 OF 0 4

TITLE (4) Technical Specification Violation

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	5	3	0	8	5	8	5	0	2	7	0	5	0	0	0
0	5	3	0	8	5	8	5	0	1	0	7	1	1	8	5

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)									
POWER LEVEL (10)	1 0 0	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)						
		20.405(a)(1)(i)	50.38(c)(1)	50.73(a)(2)(v)	73.71(c)						
		20.405(a)(1)(ii)	50.38(c)(2)	X 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 365A)						
		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)(ix)							

LICENSEE CONTACT FOR THIS LER (12)
NAME William R. Campbell - Superintendent, Engineering TELEPHONE NUMBER
AREA CODE 3 1 1 4 6 1 7 1 6 1 - 1 8 4 6 1 9

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs	

SUPPLEMENTAL REPORT EXPECTED (14)
YES (If yes, complete EXPECTED SUBMISSION DATE) X NO
EXPECTED SUBMISSION DATE (15) MONTH DAY YEAR

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

At 1030 CDT on 5/30/85 while in Mode 1 (Power Operation) at 100% reactor power, it was determined that Surveillance Procedure, OSP-EJ-P001A, required by Technical Specification (T/S) 3.5.2 to verify Residual Heat Removal (RHR) Pump 'A' operability, isolated two of the four Reactor Coolant System Cold Leg injection pathways. The Safety Analysis assumed four leg injection from RHR. Performance of this surveillance resulted in violation of T/S 3.5.2. Immediate corrective action was to initiate a Temporary Change Notice for OSP-EJ-P001A to allow surveillance testing while maintaining RHR Train 'B' line-up to 4 Cold Leg injection pathways. The surveillance was satisfactorily completed on 5/30/85.

This incident occurred as a result of misinterpreting operability criteria for the RHR system. Formerly, one RHR train was deemed to include injection for only 2 of 4 Cold Legs. This former criteria had affected all surveillances performed prior to 5/30/85. To prevent recurrence, Operations personnel were informed of the new interpretation and procedure revisions for both trains were initiated.

This event did not present a significant safety concern since the procedure did not prevent other portions of the ECCS to perform as designed. Due to plant configuration, this event posed no threat to the public health and safety.

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PDR ADOCK 05000483
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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/85

FACILITY NAME (1) Callaway Plant Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 4 8 3	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 5	— 0 2 7	— 0 1	0 2	OF	0 4

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

At 1030 CDT on 5/30/85 while in Mode 1 (Power Operation) at 100% reactor power, Operations personnel were preparing for a routine performance of Surveillance Procedure OSP-EJ-P001A, 'Section XI Residual Heat Removal (RHR) Train "A" Operability.' During a routine inspection, a NRC Inspector discovered that the procedure authorized closure of RHR (IEEE Std. 805-1983, System-BP) Pump 'B' to Hot Leg Injection Valve, EJ-HV-8716B, (IEEE Std. 803A-1983, Component-INV), and RHR Cold Leg Injection Isolation Valve, EJ-HV-8809A, (IEEE Std. 803A-1983, Component - ISV) during initial line-up which would allow test flow to return to the Refueling Water Storage Tank (IEEE Std. 803A-1983, Component - TK). Refer to the attached illustration of the RHR system. However, closing either one of these valves prevents RHR Train 'B' from supplying redundant flow to two of the four Reactor Coolant System (RCS) (IEEE Std. 805-1983 - system - AB) Cold Leg injection headers when Train 'A' is removed for testing. This condition is prohibited by Technical Specification (T/S) 3.5.2. A Temporary Change Notice was issued to assure EJ-HV-8716B and EJ-HV-8809A remained open during the test and the procedure was performed on 5/30/85 satisfactorily.

This incident occurred as a result of misinterpreting operability criteria for the RHR system. Formerly, RCS Cold Legs 1 and 2 were considered part of RHR Train 'A' only and could be cross-tied to Train 'B' by valves EJ-HV-8716A and B. Respectively, RHR Train 'B' included RCS Cold Legs 3 and 4 with similar capability to cross-tie into Train 'A' injection lines.

Due to this misinterpretation, performances of RHR Train 'A' and 'B' operability Surveillances prior to 5/30/85, have isolated two of the four Cold Leg injection pathways and placed Callaway Plant in a condition prohibited by the Technical Specifications. However, the duration for the inoperability for each test averaged 33 minutes and the likelihood of sudden deterioration of plant conditions within that time was minimal. If a sudden transient had occurred, the RHR Train not under testing could have been made available to all 4 Cold Legs by opening valves EJ-HV-8716A and EJ-HV-8809B or EJ-HV-8716B and EJ-HV-8809A from the Control Room depending on the particular Train in test. In addition, the Safety Injection System (IEEE Std. 805-1983, system - BQ), the Charging System (IEEE Std. 805-1983, system - BQ) and Accumulator Safety Injection System were available to perform ECCS functions. Thus, no significant safety consequences resulted from this event.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

In response to this incident, Operations personnel were notified by Night Order of the new interpretation of operability for the RHR system. Surveillance procedures OSP-EJ-P001A and OSP-EJ-P001B, 'Section XI RHR Train "B" Operability' were revised. Testing is now accomplished by using the RHR mini-flow line (as shown on the attached diagram) which eliminates the need to isolate 2 Cold Legs. Also, inquiry to other utilities was initiated through Nuclear Notepad about testing on the RHR mini-flow line. Currently, stroke testing occurs quarterly in Modes 1, 2 (Startup), 3 (Hot Standby) and 4 (Hot Shutdown) for valves EJ-HV-8716A and B per EDP-ZZ-01001, 'Section XI Pump and Valve Program.' This could also result in violation of T/S 3.5.2 per the new interpretation in this LER. A Relief Request will be written prior to the next Surveillance due date to eliminate this testing in Modes other than Mode 5 (Cold Shutdown) and Mode 6 (Refueling).

Due to plant configuration at the time of this event, no threat was posed to the public health and safety.

Previous occurrences: none

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)

DOCKET NUMBER (2)

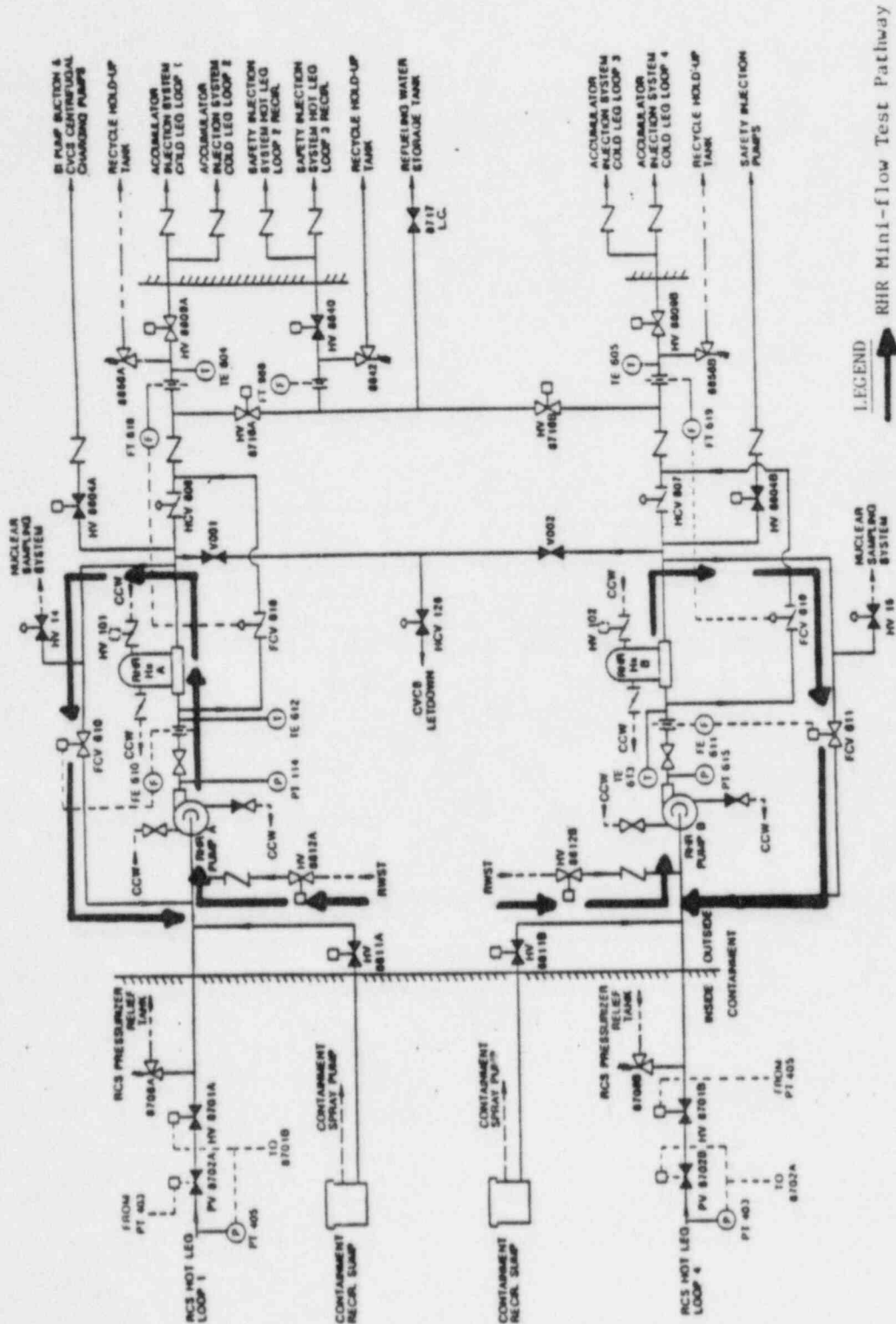
LER NUMBER (6)

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Callaway Plant Unit 1

0 5 0 0 0 4 8 3 8 5 - 0 2 7 - 0 1 0 4 OF 0 4

TEXT (if more space is required, use additional NRC Form 388A's) (17)



RESIDUAL HEAT REMOVAL SYSTEM

UNION ELECTRIC COMPANY
1901 GRATIOT STREET - ST. LOUIS

MAILING ADDRESS:
P. O. BOX 149
ST. LOUIS, MO. 63166

July 11, 1985

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

ULNRC-1135

Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
FACILITY OPERATING LICENSE NPF-30
LICENSEE EVENT REPORT 85-027-01
T/S 3.5.2 VIOLATION DUE TO INOPERABLE RHR SYSTEM

The enclosed Licensee Event Report is submitted to amend LER
85-027-00, transmitted by ULNRC-1118 dated 6/28/85, concerning a
condition prohibited by plant Technical Specification (T/S) 3.5.2.

Andrew P. Neuhalfen
S. E. Miltenberger
for Manager, Callaway Plant

Doc MB gene
WRC/WRR/SEMe/gjt
Enclosure

cc: Distribution attached

IE22
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cc distribution for ULNRC-1135

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N. Date