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| NRC FORM 366 (4-95) | | U.S. NUCLEAR REGULATORY COMMISSION | | APPROVED BY OMB NO. 3150-0104 EXPIRES 4/30/98 | |
| LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block) | | | | | |
| Facility Name (1) COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1 | | | | Docket Number (2) 05000445 | Page (3) 1 OF 5 |
| Title (4) THE 480V SWITCHGEAR BREAKERS RACKED OUT IN THE CUBICLE IN THE REMOVE POSITION RESULTING IN A SEISMICALLY UNQUALIFIED CONDITION OUTSIDE THE DESIGN BASIS | | | | | |
| Event Date ((5)) | | LER Number (6) | | Report Date (7) | |
| Month | Day | Year | Year | Sequential Number | Revision Number |
| 1 | 1 | 1 | 2 | 9 | 6 |
| Other Facilities Involved (8) | | Facility Name | | | |
| CPSES UNIT 2 | | Docket Numbers | | | |
| 0 5 0 0 0 4 4 6 | | N/A | | | |
| Operating Mode (9) 4 Power Level (10) 000 This report is submitted pursuant to the requirements of 10 CFR 5. (Check one or more) (11) | | | | | |
| 20.2201 (b) | | 20.2203 (a) (2) (v) | | 50.73 (a) (2) (i) | |
| 20.2203 (a) (1) | | 20.2203 (a) (3) (i) | | 50.73 (a) (2) (ii) | |
| 20.2203 (a) (2) (i) | | 20.2203 (a) (3) (ii) | | 50.73 (a) (2) (iii) | |
| 20.2203 (a) (2) (ii) | | 20.2203 (a) (4) | | 50.73 (a) (2) (iv) | |
| 20.2203 (a) (2) (iii) | | 50.36 (c) (1) | | 50.73 (a) (2) (v) | |
| 20.2203 (a) (2) (iv) | | 50.36 (c) (2) | | 50.73 (a) (2) (vi) | |
| Licensee Contact For This LER (12) | | | | | |
| Name FRED W. MADDEN, TECHNICAL SUPPORT MANAGER | | | | Telephone Number (Include Area Code) (817)897-8601 | |
| Complete One Line For Each Component Failure Described in This Report (13) | | | | | |
| Cause | System | Component | Manufacturer | Reportable To NPRDS | Reportable To NPRDS |
| | | | | N | |
| Supplemental Report Expected (14) | | | | | |
| X YES (If yes, completed EXPECTED SUBMISSION DATE) | | | | NO | |
| EXPECTED SUBMISSION DATE (15) | | | | Month | Day |
| | | | | 0 | 2 |
| | | | | 1 | 5 |
| | | | | 9 | 7 |
| ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16) | | | | | |
| <p>On November 6, 1996, at approximately 4:56 p.m., nine spare Westinghouse 480 V switchgear breakers (Type DS) were found racked out in their cubicles in the "REMOVE" position at Comanche Peak Steam Electrical Station (CPSES) Units 1 and 2. These 480 V switchgear breakers were seismically qualified by testing in the "CONNECT" and "DISCONNECT" positions only. On November 12, 1996, TU Electric Engineering concluded that the seismic qualification of the 480 V switchgear has not been established for the "REMOVE" position of the breakers. Therefore, the condition was considered outside of the CPSES design basis.</p> <p>TU Electric believes that the cause of this condition was that, the restriction for the breaker position to maintain seismic qualification of the 480 V switchgear was not reflected in the plant procedures. Immediate corrective actions were taken on November 6, 1996 to place these spare breakers in the "DISCONNECT POSITION". TU Electric is evaluating current plant procedures to provide for full removal of the breaker from the switchgear upon placing a breaker in the "REMOVE POSITION". TU Electric will provide additional information with respect to qualification of these breakers in a supplement to this LER. The estimated date for the aforementioned supplement is February 15, 1997.</p> | | | | | |

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Text (if more space is required, use additional copies of NRC Form 365A) (17)

I. DESCRIPTION OF THE REPORTABLE EVENT**A. REPORTABLE EVENT CLASSIFICATION**

Any event or condition that resulted in the nuclear power plant being in a condition that was outside the design basis of the plant.

B. PLANT OPERATING CONDITIONS PRIOR TO THE EVENT

On November 12, 1996, Comanche Peak Steam Electric Station (CPSES) Unit 1 was in Mode 4 in its fifth refueling outage and Unit 2 was in Mode 1, Power Operation, at approximately 100 percent power.

C. STATUS OF STRUCTURES, SYSTEMS, OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

There were no inoperable structures, systems, or components that contributed to the event.

D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES

On November 6, 1996, after receiving information from other operating nuclear power plants that breakers may not be seismically qualified if left in the "REMOVE" position, TU Electric performed a walkdown of the Unit 1 and Unit 2 6.9 Kv and 480 V switchgear breakers. On November 6, 1996 at approximately 4:56 p.m., operations personnel identified nine Class 1E Westinghouse 480 V spare switchgear breakers (Type DS) racked out inside the cubicle in the "REMOVE" position. Seismic qualification requirements for these breakers indicated that since the Type DS circuit breakers were tested in the "CONNECTED" and "DISCONNECTED" positions only, seismic qualification may not have been established if the Type DS circuit breakers were left in the "REMOVE" position.

On November 12, 1996, TU Electric engineering confirmed that the breakers were unqualified seismically in this position and determined that this situation represents a condition that is outside of the design basis of the plant and therefore requires a 1 hour notification pursuant to 10CFR50.72. At approximately 2:38 p.m., on November 12, 1996, the NRC was notified of the event via the Emergency Notification System.

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E. THE METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE OR PROCEDURAL ERROR

Following review of an NRC Daily Events Report on November 6, 1996 it was determined that similar breakers at TU Electric could be placed in an unqualified position. A walkdown of Unit 1 and Unit 2 480 V and 6.9 KV breakers was performed to determine if a similar condition existed at CPSES. The walkdown confirmed that the condition existed at CPSES for nine Class 1E Westinghouse 480 V spare switchgear breakers.

II. COMPONENT OR SYSTEM FAILURES

A. FAILURE MODE, MECHANISM, AND EFFECT OF EACH FAILED COMPONENT

Breakers racked out in the "REMOVE POSITION" within the switchgear cubicles are not seismically restrained. The breaker could therefore, potentially act as a missile adversely impacting other safety related equipment required to operate during a seismic event.

B. CAUSE OF EACH COMPONENT OR SYSTEM FAILURE

No failed components or systems contributed to this event.

C. SYSTEMS OR SECONDARY FUNCTIONS THAT WERE AFFECTED BY FAILURE OF COMPONENTS WITH MULTIPLE FUNCTIONS

No failed components contributed to this event.

D. FAILED COMPONENT INFORMATION

No failed components contributed to this event.

III. ANALYSIS OF THE EVENT

A. SAFETY SYSTEM RESPONSES THAT OCCURRED

No safety system responses occurred as a result of this event.

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B. DURATION OF SAFETY SYSTEM TRAIN INOPERABILITY

No safety system trains were inoperable as a result of this event.

C. SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT

TU Electric believes that the as found condition of the breakers found (unqualified position) represented a potential for the breakers to adversely impact other components in their cubicles, such that the adjacent relays could start to chatter during a seismic event. TU Electric is further reviewing the impact of this condition and will provide additional information in the supplement of this LER. The immediate corrective action performed by TU Electric provides adequate confidence that if a seismic event occurs, it will not impact the health and safety of the public.

IV. CAUSE OF THE EVENT

The restriction for the breaker position to maintain seismic qualification of the 480 V switchgear was not reflected in the plant procedures.

V. CORRECTIVE ACTIONS

Immediate action was taken on November 6, 1996 to place the affected breakers in the "DISCONNECTED POSITION". Seismic qualification documentation and associated test reports for the 6.9 Kv switchgear and reactor trip breakers were reviewed, and it was concluded that a similar potential failure scenario applies to the 6.9 Kv and reactor trip circuit breakers; however, no 6.9 Kv or reactor trip circuit breakers were found in the "REMOVE POSITION".

As an interim precaution Operations shift orders provide sufficient guidance to maintain the breakers in their respective seismically qualified position. Additionally, TU Electric is evaluating current plant procedures for full removal of the breaker from the switchgear upon placing a breaker in the "REMOVE POSITION".

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VI. PREVIOUS SIMILAR EVENTS

There have been no previous similar events related to breakers and associated Class 1E switchgear reported pursuant to 10CFR50.73.