

## LICENSEE EVENT REPORT (LER)

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

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	6	1	7	8	5	8	5	0	3	0	0 5 0 0 0
0	6	1	7	8	5	8	5	0	3	0	0 5 0 0 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)

OPERATING MODE (9)	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
1	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(iv)	73.71(c)
POWER LEVEL (10) 1 0 0	20.405(a)(1)(ii)	50.36(c)(2)	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 M. E. Taylor - Superintendent, Operations TELEPHONE NUMBER 3 1 1 4 6 1 7 6 1 - 1 8 1 2 1 0 1 7  
AREA CODE

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

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 1300 CDT on 6/17/85, while in Mode 1 (Power Operation) at 100% reactor power, it was discovered that Pressurizer Vapor Sample Outer Containment Isolation Valve, SJ-HV-0013, was not tested within the required Technical Specification (T/S) 4.0.2 frequency extension limits. The applicable surveillance procedure was immediately performed and completed satisfactorily.

This incident occurred after SJ-HV-0013 was de-energized as isolation for Pressurizer Vapor Sample Inner Containment Isolation Valve, SJ-HV-0012, to comply with T/S 3.6.3 Action Statement b. Upon restoration of SJ-HV-0012, SJ-HV-0013 was returned to service without testing and allowed to exceed T/S 4.0.2 limits. This resulted from lack of specific retesting criteria stated on tracking documentation due to personnel error.

Operations personnel were notified in writing that individual components declared or maintained inoperable should be entered and tracked separately in the Equipment Out-of-Service Log. The Compliance and Planning & Scheduling Departments reviewed their methods of tracking and found no significant deficiencies.

Engineering evaluated that SJ-HV-0013 was capable of performing its function during this period of time. Therefore, this event did not present a significant safety concern.

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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 3 0	— 0 0	0 2	OF	0 3

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

At 1300 CDT on 6/17/85, while in Mode 1 (Power Operation) at 100% reactor power, Site Engineering personnel were reviewing test data from Surveillance Procedure OSP-SJ-V0001, 'Section XI Nuclear Sampling System Mode 1 Isolation Valve Operability' for trending purposes. It was discovered that Pressurizer Vapor Sample Outer Containment Isolation Valve, SJ-HV-0013 (IEEE Std. 805-1983, System - JM, IEEE Std. 803A-1983, Component - ISV), which requires quarterly stroke testing in accordance with Technical Specification (T/S) 4.6.3.3 and T/S 4.0.5, was allowed to exceed its surveillance due date by more than 25% of its frequency interval. This condition is prohibited by T/S 4.0.2. Immediate corrective action included issuance of a surveillance task sheet to run OSP-SJ-V0001 on SJ-HV-0013 which was performed satisfactorily on 6/17/85.

This incident occurred as a result of personnel providing inadequate tracking documentation specifying retest requirements for SJ-HV-0013 as illustrated below in the sequence of events prior to 6/17/85:

1. On 4/4/85 at 0830 CST, Pressurizer Vapor Sample Inner Containment Isolation Valve, SJ-HV-0012 (System - JM, Component - ISV) was declared inoperable and SJ-HV-0013 deactivated to comply with T/S 3.6.3 Action Statement b, which states: "With one or more of the containment isolation valve(s) specified in Table 3.6-1 inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and:
  - a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
  - b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or
  - c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange, or
  - d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

Valve SJ-HV-0012 was entered in the Equipment Out-of-Service Log (E.O.S.L.) in accordance with ODP-ZZ-00002, 'Equipment Status Control' with annotation on the status of SJ-HV-0013.

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

2. On 4/12/85, the T/S surveillance due date for OSP-SJ-V0001, valves under its scope were tested except SJ-HV-0012 and SJ-HV-0013 since T/S 4.0.3 states that "Surveillance Requirements do not have to be performed on inoperable equipment." No E.O.S.L. entry was made to status SJ-HV-0013 as inoperable. A retest task sheet was issued to test these valves but inadvertently misplaced.
3. On 5/1/85, SJ-HV-0012 was retested as instructed by work request and placed back into service. SJ-HV-0013 was reactivated but not tested since no paperwork specified its operability, or indicated its surveillance was past due.
4. Therefore, 5/5/85 was never recognized as the T/S 4.0.2 late date.

Engineering evaluated the operability condition of SJ-HV-0013 during the time of T/S 4.0.2 violation from 5/6/85 to 6/17/85, and it was determined that the valve was capable of performing its isolation function. Therefore, no significant safety consequences resulted from this event.

Due to the personnel error involved in tracking SJ-HV-0013, Operations personnel were informed by letter that separate E.O.S.L. entries should be made when a component or device fails a surveillance, or when a T/S required component is tagged out-of-service preventing its surveillance testing. Compliance and Planning & Scheduling personnel reviewed their tracking programs and consider the E.O.S.L. program as a primary means of tracking such conditions. Therefore, the inadvertent task sheet misplacement is considered an isolated case of personnel error.

No threat was posed to the public health and safety during the event.

Previous occurrences: none

UNION ELECTRIC COMPANY  
CALLAWAY PLANT

MAILING ADDRESS:  
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July 17, 1985

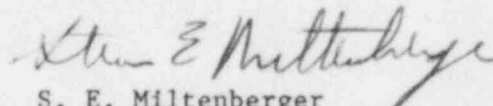
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ULNRC-1141

Gentlemen:

DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
FACILITY OPERATING LICENSE NPF-30  
LICENSEE EVENT REPORT 85-030-00  
TECHNICAL SPECIFICATION 4.0.2 VIOLATION

The enclosed Licensee Event Report is submitted pursuant to  
10 CFR 50.73(a)(2)(i)(B) concerning the failure to surveillance test  
an outer containment isolation valve within T/S 4.0.2 time limits.

  
S. E. Miltenberger  
Manager, Callaway Plant

*ab seme*  
MET/WRR/SEMe/drs  
Enclosure

cc: Distribution attached

IE22  
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cc distribution for ULNRC-1141

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