

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Palo Verde Unit 1										DOCKET NUMBER (2) 0 5 0 0 0 5 1 2 1 8										PAGE (3) 1 OF 0 2	
TITLE (4) Operator Errors In Performance Of Safety Surveillance																					
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	2	2 8	5	8 5	0 3 9	0 0	0 7	2 2	8 5				0 5 0 0 0								
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																			
1		20.402(b)				20.406(e)				50.73(a)(2)(iv)				73.71(b)							
POWER LEVEL (10)		20.406(a)(1)(i)				50.36(e)(1)				50.73(a)(2)(v)				73.71(e)							
0 1 1 9		20.406(a)(1)(ii)				50.36(e)(2)				50.73(a)(2)(vii)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)							
		20.406(a)(1)(iii)				50.73(a)(2)(i)				50.73(a)(2)(viii)(A)											
		20.406(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)											
		20.406(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(ix)											
LICENSEE CONTACT FOR THIS LER (12)																					
NAME W. F. Quinn, Manager - Nuclear Licensing (extension 4087)										TELEPHONE NUMBER											
										AREA CODE 6 0 2 9 4 3 7 2 0 0											
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																					
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS												
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)

On June 22, 1985, Palo Verde Unit 1 was in Mode 1 at 19.5 percent power conducting testing in accordance with the Power Ascension Test Program. Technical Specification (Tech. Spec.) 4.1.3.6 requires, "The position of each regulating CEA [Control Element Assembly] group shall be determined to be within the Transient Insertion Limits at least once per 12 hours except during intervals when the PDIL [Power Dependent Insertion Limit] Auctioneer Alarm Circuit [IG] is inoperable, then verify the individual CEA positions at least once per 4 hours." Performance of Procedure 41ST-1ZZ23 at the required interval satisfies this Tech. Spec. The operators were performing 41ST-1ZZ23 at the 12-hour interval. The Reactor Engineering group informed the operators that the PDIL was not yet considered to be operable which meant that 41ST-1ZZ23 should be performed on a 4-hour interval. Upon being informed of this, the operators started performing the required surveillance on a 4-hour interval. The LCO and Action Statements for Tech. Spec. 3.1.3.6 had not been violated.

The root cause of this event was personnel error; Operations and Reactor Engineering Personnel have been reminded of the importance of verifying the status of equipment when determining surveillance requirements.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/85

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Palo Verde Unit 1	05000528	85	039	00	02	OF 02

TEXT (If more space is required, use additional NRC Form 365A's) (17)

On June 22, 1985, Palo Verde Unit 1 was in Mode 1 at 19.5 percent power. Testing was being conducted in accordance with the Power Ascension Test Program. Tech. Spec. surveillance requirement 4.1.3.6 requires that "The position of each regulating CEA [Control Element Assembly] group shall be determined to be within the Transient Insertion Limits at least once per 12 hours except during time intervals when the PDIL [Power Dependent Insertion Limit] Auctioneer Alarm Circuit [IG] is inoperable, then verify the individual CEA positions at least once per 4 hours." This surveillance requirement is satisfied by the performance of procedure 41ST-1ZZ23 at the required intervals.

The operators were performing the required surveillance at the 12 hour interval, taking credit for the PDIL Auctioneer Alarm Circuit being operable. The Reactor Engineering Group informed the operators that the PDIL had not been proven operable, per procedure 72IC-1RX04, and therefore, was considered to be inoperable. With the PDIL inoperable, the required interval for performance of 41ST-1ZZ23 was 4 hours. Upon being made aware of this information, the operator complied with requirements of Tech. Spec. 4.1.3.6. The Limiting Condition for Operation (LCO) and Action Statements for Tech. Spec. 3.1.3.6 had not been violated. Tech. Spec. 3.1.3.6 is applicable whenever the reactor is in Mode 1 or 2 with some Special Test Exceptions which are addressed in Tech. Spec. 3.10.2 and 3.10.4. Unit 1 entered Mode 2 on May 25, 1985. Much of the interval between May 25 and June 22 does fall under the provisions of the Special Test Exception, however, the operators were not knowingly taking credit for those allowable exceptions and, in fact, the required 4 hour surveillance interval was violated during some of that period.

There were no safety consequences associated with this event. CEA positioning during the initial physics testing and subsequent power ascension testing is done in accordance with Reactor Engineering direction and monitored continuously by the operators as well as the Reactor Engineering group. Also, the normal CEA configuration for power operation is with all rods out, which provides the maximum margin between the PDIL and the actual CEA position.

The cause of this event was personnel error because the licensed operators did not assure that the PDIL Auctioneer Alarm Circuit was fully operable prior to taking credit for it while establishing the surveillance interval.

A contributing factor was the failure of the Reactor Engineering personnel to assure that the operators were aware that the Auctioneer Alarm Circuit was not yet verified operable. Operations and Reactor Engineering personnel have been reminded of the importance of verifying the status of equipment when determining surveillance requirements.

A method is being developed to determine testing of the operability of the PDIL Auctioneer Alarm Circuit.



Arizona Nuclear Power Project

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

July 22, 1985
ANPP-33083-EEVB/GEC

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Unit 1
Docket No. STN 50-528, License No. NPF-41
Licensee Event Report - Operator Errors in
Performance of Safety Surveillance
File: 85-056-026; G.1.01.10

Dear Sirs:

Attached please find Licensee Event Report (LER) No. 85-039-00 prepared and submitted pursuant to 10 CFR 50.73. This LER addresses operator errors in performance of safety surveillance. In accordance with 10 CFR 50.73(d), we are herewith forwarding a copy of the LER to the Regional Administrator of the Region V Office.

If you have any questions or concerns, please contact me.

Very truly yours,

E. E. Van Brunt, Jr.
Executive Vice President
Project Director

EEVB/GEC/slh
Attachments

cc: J. B. Martin (all w/a)
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