

Commonwealth Edison Company
Zion Generating Station
101 Shiloh Boulevard
Zion, IL 60099-2797
Tel 847-746-2084



January 16, 1997

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

The enclosed Licensee Event Report number 96-011-00, Docket No. 50-304/DPR-48 from Zion Generating Station is being transmitted to you in accordance with 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,

A handwritten signature in cursive script, appearing to read "George K. Schwartz".

G. K. Schwartz
Station Manager
Zion Generating Station

GKS

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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LICENSEE EVENT REPORT (LER)

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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 | | | | | | | | | | |
| TITLE Reactor Trip Breakers Were Closed While Core Was Off-Loaded Because Of Non-Conservative Technical Specification Application Causing No Plant Impact | | | | | | | | | | | | | | | | | | | | | | | | |
| EVENT DATE | | | LER NUMBER | | | | REPORT DATE | | | OTHER FACILITIES INVOLVED | | | | | | | | | | | | | | |
| MONTH | DAY | YEAR | YEAR | SEQ. NUMBER | REVISION | MONTH | DAY | YEAR | FACILITY NAMES | | | | DOCKET NUMBER(S) | | | | | | | | | | | |
| 1 | 2 | 1 | 7 | 9 | 6 | 9 | 6 | - | 0 | 1 | 1 | - | 0 | 0 | 0 | 1 | 1 | 6 | 9 | 7 | | | | |
| OPERATING MODE 6 | | | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (CHECK ONE OR MORE OF THE FOLLOWING) | | | | | | | | | | | | | | | | | | | | | |
| POWER LEVEL 0 0 0 | | | 20.402(b) | | | | 20.405(e) | | | | 50.73(a)(2)(iv) | | | | 73.71(b) | | | | | | | | | |
| | | | 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. Brennan 847-746-2084 X 2380 | | | | | | | | | | TELEPHONE NUMBER 8 4 7 7 4 6 - 2 0 8 4 | | | | | | | | | | | | | | |
| 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 | | | | | | | | | | | | | | |
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| 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 12-OCT-96 and again on 13-OCT-96, while Unit 2 was in a core off-loaded condition, personnel closed the Unit 2 Reactor Trip Breakers (RTB) as part of planned Rod Control Enhanced Maintenance. Although the applicability of specification 3.2.3.D.1.2, "Inoperable Rod Position Indicator Channels," to the conditions at the time of this event was not clearly defined, on 17-DEC-96, Station Management concluded that these events should be conservatively reported as a non-compliance with Technical Specification 3.2.3.D.1.2. This event had no adverse impact on the health and safety of the public and did not adversely impact the safety of the plant. The non-compliance occurred since the RTBs were closed with multiple Rod Position Indicators inoperable after being disconnected for planned maintenance in refueling outage Z2R14. The RTBs were closed at that time because personnel believed the requirements of Technical Specification 3.2.3.D.1.2 did not apply. Personnel believed the Technical Specification did not apply because the core was off-loaded and the specification at that time did not contain a specific applicability statement. The core off-loaded condition is not encompassed by the operational MODES defined by Technical Specifications. The Technical Specification has been changed to clarify applicability and to prevent reoccurrence.

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 1 1 | - 0 0 | | 0 2 | OF 0 4 |

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

A. PLANT CONDITIONS PRIOR TO EVENT

Unit 1 MODE 1 - Power Operations Rx Power 100% RCS [AB] Temperature/Pressure 559 Deg. F. / 2235 psig

Unit 2 MODE Not Defined - Defueled Rx Power 0% RCS [AB] Temperature/Pressure Building Ambient / 0 psig

B. DESCRIPTION OF EVENT

Zion Station planned to perform and complete Rod Control Enhanced Maintenance (RCEM) on the Unit 2 Rod Control Logic Cabinets [AA] during the 1996 refueling outage (Z2R14). Prior to commencement of RCEM work in Z2R14, the project team with assistance of Regulatory Assurance and Engineering resources examined the applicable operability requirements. The team decided that since the subject Rod Position Indicator (RPI) [AC] Technical Specification (3.2.3.D.1.2., "Inoperable Rod Position Indicator Channels") did not contain a specific applicability statement, it applied only when the reactor contained fuel. On this basis, the work was planned such that opening and closing of Reactor Trip Breakers (RTB) [AA] could be performed according to procedure, as necessary when the core was off-loaded.

On 14-SEP-96, Zion Station commenced the Unit 2 refueling outage (Z2R14). By 05-OCT-96, the Unit 2 reactor head [AC] was removed, and the core [AC] was off-loaded. The RCEM project work required closure of the Reactor Trip Breakers and on 12 and 13-OCT-96, the RTBs were closed according to the RCEM plan. On 17-OCT-96, the Unit 2 core reload began and on 26-NOV-96 the core re-load was completed.

On 17-DEC-96 Station Management re-evaluated the earlier position and plans of the RCEM project team and decided that a more conservative application of the specification was warranted. With a more conservative application of the specification, closing the RTBs on 12 and 13-OCT-96, has been determined to be a non-compliance with Technical Specification 3.2.3.D.1.2. The RTBs were closed approximately 7 hours on 12-OCT-96 and approximately 6 hours on 13-OCT-96.

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

C. CAUSE OF EVENT

This event was caused by Management Deficiency, as follows: Personnel closed the Reactor Trip Breakers because after review, planning and preparation, they believed the requirements of Technical Specification 3.2.3.D.1.2., "Inoperable Rod Position Indicator Channels" did not apply. Personnel believed the Technical Specification did not apply because the specification did not contain a specific applicability statement and the core was off-loaded. The evolution was planned, approved and performed with management oversight at the time. Subsequent review concluded this decision was not appropriately conservative.

D. SAFETY ANALYSIS

Since the plant was defueled when the Reactor Trip Breakers were closed, this event had no adverse safety significance. Zion Unit 2 RTBs were closed during the Z2R14 refueling outage when the core, including the control rods [AC], was off-loaded to the Spent Fuel Storage Pool [DB]. RPI channels provide a means of measuring control rod position and alignment to ensure that power distribution and reactivity limits defined by the design power peaking and shutdown margin are preserved. Power peaking factors are not a concern when the core is off-loaded, and shutdown margin is measured by determining the amount of chemical shim. In addition, RPI channels are not a precursor to any analyzed accident sequence. Therefore, this event had no adverse safety impact.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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| FACILITY NAME ZION NUCLEAR POWER STATION UNIT 2 | DOCKET NUMBER 0 5 0 0 0 3 0 4 | LER NUMBER | | | PAGE | | |
| | | YEAR | SEQ. NUMBER | REVISION | | | |
| | | 9 6 - | 0 1 1 - | 0 0 | 0 4 | OF | 0 4 |

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

E. CORRECTIVE ACTION

Subsequent to this event, on 25-NOV-96 Technical Specification Amendments 176 for Unit 1 and 163 for Unit 2 became effective, and clarified Technical Specification 3.2.3.D.1.2., "Inoperable Rod Position Indicator Channels". These amendments defined the MODE of applicability for the subject Technical Specifications as MODE 1 and MODE 2. These are the only MODES in which power peaking factors are a concern and the operability of Rod Position Indicator channels have the potential to affect the safety of the plant.

F. PREVIOUS EVENTS SEARCH AND ANALYSIS

The Station has not reported non-compliances with Technical Specification 3.2.3.D.1.2. of this nature in the past although it has been a common practice to close Reactor Trip Breakers to calibrate Rod Position Indicators during outages. This will not be an issue in the future because Improved Technical Specifications will be implemented and the related specification provides explicit applicability requirements.

G. COMPONENT FAILURE DATA

No component failures were associated with this event.