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ILLINOIS POWER

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Docket No. 50-461

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

Subject: Clinton Power Station - Unit 1
Licensee Event Report No. 96-015-01

Dear Sir:

Enclosed is Licensee Event Report (LER) No. 96-015-01: Lack of Attention to Detail During Procedure Performance Causes Unplanned Engineered Safety Feature Actuation of Eight Containment Isolation Valves. The LER has been revised to identify the cause, corrective action, safety significance and previous similar event information. This report is being submitted in accordance with the requirements of 10CFR50.73.

Sincerely yours,

Wilfred Connell

Wilfred Connell
Vice President

MRS/krk

Enclosure

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety
INPO Records Center

NRC FORM 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 04/30/98

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
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TITLE (4)
Lack of Attention to Detail During Procedure Performance Causes Unplanned Engineered Safety Feature Actuation of Eight Containment Isolation Valves

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 NAME	DOCKET NUMBER
									None	05000
10	26	96	96	015	01	01	17	97	FACILITY NAME: None	DOCKET NUMBER: 05000

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
	5		20.2201(b)		20.2203(a)(2)(v)		50.73(a)(2)(i)		50.73(a)(2)(viii)
POWER LEVEL (10)			20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)
	0		20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71
			20.2203(a)(2)(ii)		20.2203(a)(4)	X	50.73(a)(2)(iv)		OTHER
			20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
R. C. Reichert, Senior Specialist-Engineering	(217) 935-8881, Extension 3970

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

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 15 single-spaced typewritten lines) (16)

On October 26, 1996, the plant was in Mode 5 (Refueling) and Operations personnel were performing Clinton Power Station (CPS) procedure 9080.21, "Diesel Generator 1A-ECCS Integrated." Portions of the procedure were noted by Operations personnel as not required because they had previously been successfully completed. During performance of the procedure there was an unexpected actuation of eight containment isolation valves associated with the drywell cooling and chilled water systems. The cause of this event was attributed to a lack of attention to detail when noting sections of CPS procedure 9080.21 as not required. Contributing to this event was the complexity of the test and the placement of the steps that prevent actuation of the containment isolation valves in a section of the procedure where actuation of the valves was not a concern. Corrective actions for this event include: placing a description of this event in the Operations Night Orders and revising CPS 9080.21, 9080.22, and 9080.23 to either move the applicable prerequisite steps that are required in another section of the procedure to the appropriate section or to identify in the section that contains the step the section that requires its use.

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TEXT *(If more space is required, use additional copies of NRC Form 366A)* (17)

DESCRIPTION OF EVENT

On October 26, 1996, the plant was in Mode 5 (Refueling) with the reactor pressure vessel [RCT] head removed and the pool over the reactor pressure vessel being maintained at greater than 23 feet above the reactor pressure vessel flange. Operations Department personnel were preparing to perform Clinton Power Station (CPS) surveillance procedure 9080.21, "Diesel Generator 1A-ECCS Integrated." Only part of this surveillance procedure was being performed because portions of the procedure had been successfully performed several days earlier. In order to conduct the remaining portions of the surveillance procedure, Operations personnel reviewed the procedure and determined which steps in the procedure were required in order to allow its successful completion. The individual that performed this review placed a note in the steps of the procedure that were believed to be not required for completing the remaining portions of the surveillance procedure. This action is allowed by plant procedures.

At 0413 hours Operations personnel began performing surveillance procedure 9080.21. At about 0530 hours plant operators, during review of main control room panels discovered that eight Division I containment isolation valves [ISV] associated with the drywell cooling (VP) [VB] and plant chilled water systems (WO) [KM] were closed and began a review to determine why the containment isolation valves had closed. At about 0700 operators identified that steps in section 8.3 of the surveillance procedure, that would have prohibited the VP and WO containment isolation valves from closing, were not performed. These steps were not performed because they were part of the surveillance procedure that had been successfully completed earlier and were noted as not required as allowed by plant procedures. When portions of the surveillance procedure were noted as not required, it was not recognized that the steps in section 8.3, that prohibited the movement of the VP and WO containment isolation valves, were necessary to prevent actuation of these valves for the portion of the surveillance procedure that was being performed. At about 0906 hours the VP and WO containment isolation valves were restored to their normal positions using plant procedures.

No automatic or manually initiated safety system responses were necessary to place the plant in a safe and stable condition. No other equipment or components were inoperable at the start of this event to the extent that their inoperable condition contributed to this event.

CAUSE OF THE EVENT

The cause of this event was attributed to a lack of attention to detail by the individual that determined what sections of CPS procedure 9080.21 were required to be performed in order to satisfy the surveillance requirements. The individual that determined what portions of the surveillance procedure were necessary to be performed acknowledged that the steps in section 8.3 of the procedure, that would have prevented the actuation of the containment isolation valves, were not noticed during this review of the procedure. Contributing to this event was the relative complexity of the test that was being performed and the placement of the steps that prevent actuation of the containment isolation valves in a section of the surveillance procedure where actuation of the valves was not a concern.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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TEXT *(If more space is required, use additional copies of NRC Form 366A)* (17)

CORRECTIVE ACTION

A copy of the condition report that documented the occurrence and results of the investigation of this event have been placed in the Operations Night Orders for review by Operations personnel. Also, CPS 9080.21, 9080.22, "Diesel Generator 1B-ECCS Integrated" and 9080.23, "Diesel Generator 1C-ECCS" will be revised to either move the applicable prerequisite steps that are required in another section of the procedure to the appropriate section or to identify in the section that contains the step the section that requires its use.

ANALYSIS OF EVENT

This event is reportable under the provisions of 10CFR50.73(a)(2)(iv) due to the unplanned closure of containment isolation valves for the VP and WO systems, an engineered safety feature actuation.

Analysis of the safety consequences and implications of this event identified that this event was not nuclear safety significant. The unnecessary actuation of the WO and VP containment isolation valves did not impede their safety function which is to close on the appropriate isolation signal. The VP and WO systems do not have a safety function. Also, the prerequisites to the procedure prohibit the performance of this surveillance in Modes 1, 2, and 3 and therefore, this event could not have occurred under more severe conditions.

ADDITIONAL INFORMATION

No equipment or components failed during this event.

No previous engineered safety feature actuations caused by a lack of attention to detail while noting steps of a procedure as not required have been reported in recent history.

For further information regarding this event, contact R. C. Reichert, Senior Specialist-Engineering at (217) 935-8881, extension 3970.