



Consumers  
Power

**POWERING  
MICHIGAN'S PROGRESS**

Big Rock Point Nuclear Plant, 10269 US-31 North, Charlevoix, MI 49720

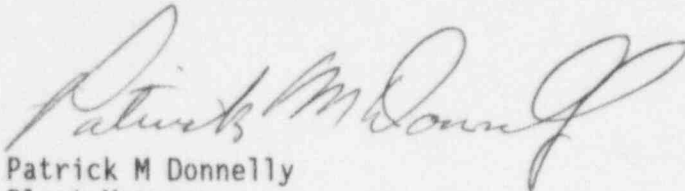
Patrick M Donnelly  
Plant Manager

October 31, 1996

Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

**DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT - LICENSEE EVENT REPORT  
96-012: 92 DAY TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENT INADVERTENTLY  
SURPASSED**

Licensee Event Report 96-012: **92 DAY TECHNICAL SPECIFICATION SURVEILLANCE  
REQUIREMENT INADVERTENTLY SURPASSED**, is attached. This event is reportable to  
the Nuclear Regulatory Commission in accordance with 10 CFR 50.73(a)(2)(i)(B)  
- Technical Specification Prohibited Operation.



Patrick M Donnelly  
Plant Manager

CC: Administrator, Region III, USNRC  
NRC Resident Inspector - Big Rock Point

ATTACHMENT

1/1  
1022

9611070203 961031  
PDR ADOCK 05000155  
S PDR

## LICENSEE EVENT REPORT (LER)

(See reverse for required number of  
digits/characters for each block)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-8 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

FACILITY NAME (1)

BIG ROCK POINT NUCLEAR PLANT

DOCKET NUMBER (2)

50-155

PAGE (3)

1 OF 5

TITLE (4)

92 Day Technical Specification Surveillance Requirement Inadvertently Surpassed.

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
10	04	96	96	012	00	10	31	96	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		Y	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)							
POWER LEVEL (10)		95%	20.2201(b)		20.2203(a)(2)(v)		X	50.73(a)(2)(i)		50.73(a)(2)(viii)
			20.2203(a)(1)		20.2203(a)(3)(i)			50.73(a)(2)(ii)		50.73(a)(2)(x)
			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)			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

Michael D. Bourassa, Licensing Supervisor

TELEPHONE NUMBER (INCLUDE AREA CODE)

1-616-547-8244

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS
B	DC	na	na	N					

## SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).		NO		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

Big Rock Point Technical Specification 4.7.11.1.1.b states: "THE FIRE SUPPRESSION WATER SYSTEM shall be demonstrated OPERABLE at least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank...is within the acceptable limits specified in Table 1 of ASTM-D975-74 with respect to viscosity, water content and sediment.

Contrary to the above, the 92 day surveillance requirement for December 1995 was not completed for 184 days. The root cause was determined to be human error. The Chemistry department uses a "status sheet" to track routine and technical specification surveillance samples. The technician (that had just completed an instrument calibration test) had initialed the diesel fuel sample "sign-off" box in error; crossed out the mistake, and placed his initials in an adjacent instrument calibration sign-off box. This led to the belief that the sample had been taken. Two samples of the diesel fuel have been taken since the missed sample. All results were within the parameters specified by ASTM-D975-74. In addition, the diesel fire pump is test operated weekly.

Corrective actions included a review of past surveillances and a "lessons learned" discussion with the chemistry technicians. To prevent recurrence, this test will be scheduled by the recently formed work control center, and human factors improvements will be made in the status sheet.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Big Rock Point Nuclear Plant	50-155	96	011	00	2 OF 5

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

## IDENTIFICATION OF THE EVENT

This event is reportable to the Nuclear Regulatory Commission pursuant to:

- 1) 10 CFR 50.73(a)(2)(i)(B) - Technical Specification Prohibited Operation.

## REFERENCES

Big Rock Point Technical Specifications 4.7.11.1.1

T90-10 Diesel Generators and Fire Pump Diesel Fuel Storage Tanks Sampling and Analysis

## DESCRIPTION OF EVENT

Big Rock Point Technical Specification 4.7.11.1.1.b states: "THE FIRE SUPPRESSION WATER SYSTEM shall be demonstrated OPERABLE at least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank [TK], obtained in accordance with ASTM-D270-65, is within the acceptable limits specified in Table 1 of ASTM-D975-74 with respect to viscosity, water content and sediment.

Contrary to the above, the 92 day surveillance requirement for December 1995 was not completed for 184 days. This condition was discovered by the Chemistry Supervisor during a routine filing of T90-10, Diesel Generators [EK] and Fire Pump Diesel [KP] Fuel Storage Tanks Sampling and Analysis performed in September, 1996.

NOTE: There is no technical specification requirement for sampling the emergency and standby diesel generators [EK].

## ROOT CAUSE

The root cause was determined to be human error compounded by inattention to detail. The Chemistry department uses a "status sheet" to track routine and technical specification surveillance samples. The technician (that had just completed an instrument calibration test) had initialed the diesel fuel sample "sign-off" box by mistake; crossed out the error, and placed his initials in the proper sign-off box, adjacent to the diesel fuel sample box. It appeared, when looking at the Status Sheet from a distance, as if the sample was taken for the month, when in fact, it had not. The technician decided not to add a date to the cross out, which is the plant practice for cross-outs, thinking that would confuse the users of the status board, because dates are used to signify that tasks are completed.

The chemistry technicians and supervisor also failed to identify the missed sample during the weekly/daily review of the status sheet.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Big Rock Point Nuclear Plant	50-155	96	011	00	3 OF 5

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

## CORRECTIVE ACTIONS

A three year review of the T90-10 analyses was conducted. All of the analyses had been performed as scheduled. All of the samples sent to the Consumers Power Company General Offices laboratory during this time also met the required specifications. A review of the status sheets, through 1993, concerning all routine and technical specification required tests and samples did not reveal any similar occurrences.

The chemistry technicians attended a "lessons learned" discussion of the event conducted by the chemistry supervisor. The supervisor expects the technicians to report any future status board errors, so that a missed surveillance will not reoccur.

To prevent recurrence, the T90-10 sample, as well as all non-daily samples and "T" Tests will be scheduled through the newly formed work control center.

In addition, the chemistry lab status sheet will be redesigned, incorporating a human factors approach. This action will be completed by January 15, 1997.

## PREVIOUS OCCURRENCES - MISSED SURVEILLANCE TESTS

LER 95-008

Big Rock Point Technical Specifications require that cell voltage is verified to be greater than or equal to 6.0 volts and specific gravity is greater than or equal to 1.2 volts on each cell of the Reactor Depressurization System (RDS) batteries; and that the cell voltage is verified to be greater than or equal to 2.1 volts and specific gravity is greater than or equal to 1.2 of each cell of the Alternate Shutdown System (ASD) battery - monthly.

Contrary to the above, on November 28, 1995, the cell voltages and specific gravities were not verified within the monthly plus 25% of the monthly surveillance requirement for battery banks 2A (RDS Uninterruptible Power Supply (UPS) - A) and battery 1612 (ASD battery). The work order was discovered while a review of the "available for scheduling" (AFS) work was being conducted. This discovery was made within a day of the exceeded surveillance requirement, and was scheduled for immediate completion. The pilot cell readings were verified to be within the technical specification limits described above.

Root cause of the missed surveillance test was determined to be human error exacerbated by an inadequate and cumbersome process. Corrective actions included enhancements to the surveillance board posted in the Maintenance Building, reading batteries on the same day of the week to promote a routine and a more direct routing of surveillance tests to scheduling.



LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Big Rock Point Nuclear Plant	50-155	96	011	00	4 OF 5

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

LER 96-011

Big Rock Point Technical Specification 11.4.1.5.a requires that the Reactor Depressurization System (RDS) be verified to be OPERABLE in accordance with the following: "at least once per month the instrumentation and system logic shall be FUNCTIONALLY TESTED as indicated in Table 11.3.1.5". (Table 11.3.1.5 requires the input and output channels be tested monthly).

Contrary to the above, the surveillance requirements for "C" RDS train were inadvertently not performed for 61 days (March 11, 1994 through May 11, 1994). This condition was discovered during an evaluation of the same surveillance test that nearly surpassed the 25% Technical Specification surveillance limit for "A" Train on September 19, 1996. Surveillance tests performed since this date have proven to be satisfactory.

The root cause was determined to be a less than adequate procedure. The information provided in the procedure controlling plant startups did not provide adequate guidance for surveillance procedures not performed during shutdown conditions.

A revision was immediately issued to the procedure, O-TGS-1; Master Checklist, providing clear instructions with regard to required RDS surveillances.

## SAFETY SIGNIFICANCE

The significance of this event is minimal based on the fact that the diesel fire pump is tested weekly, the samples taken since December 1995 have met the requirements in ASTM D975-74, Standard Specifications for Diesel Fuel Oils, and all of the samples sent to the Consumers Power Company General Offices laboratory during the last three years also met the required ASTM specifications. The diesel fire pump is also backed up by an electric driven fire pump [KP;P]. Either pump can supply the fire suppression system [KP] and the emergency core cooling system [BM].

Also, on June 4, 1987, the Staff forwarded Generic Letter 87-09, Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions For Operation and Surveillance Requirements. With regard to surveillance testing, one of the problems addressed was unnecessary shutdowns caused by inadvertent surpassing of surveillance intervals. The following italicized discussion is taken from that letter.

*"Surveillance Requirements are defined in 10 CFR 50.36 as those requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that the facility will be within the safety limits, and that the Limiting Condition of Operation (LCO) will be met."*

Consistent with the NRC's regulatory framework for Surveillance Requirements, Specification 4.0.3 states that the failure to perform a surveillance within the specified time interval shall constitute a failure to meet the LCO's Operability Requirements. Therefore, if a Surveillance Requirement is not met as a result of the failure to schedule

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
Big Rock Point Nuclear Plant	50-155	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	5 OF 5
		96	011	00	

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

*the performance of the surveillance, the LCO would not be met (the LCO associated with this case is 7 days; then a normal orderly shutdown is required within one hour)".*

The Staff then provided the following position:

*It is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. The opposite is in fact the case; the vast majority of surveillance demonstrates that systems or components in fact are operable. When a surveillance is missed, it is primarily a question of operability that has not been verified by the performance of the required surveillance.*

However, the facility does recognize that failure to perform a surveillance requirement within the specified time interval constitutes a failure to meet the Operability requirements for a Limiting Condition of Operation, and that compliance with the facility's Technical Specifications is required.