

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Browns Ferry - Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 2 5 1 9	PAGE (3) 1 OF 0 2
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TITLE (4)

Failure to Perform Surveillance Instructions

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)	
									Browns Ferry - Unit 2		0 5 0 0 0 2 6 1 0	
1	0	0	3	8	5	8	5	0	5	0	0 0 1 1 0 1 8 5	
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)									
POWER LEVEL (10)			20.402(b)			20.405(c)			50.73(a)(2)(iv)			73.71(b)
0 1 0 1 0			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)(vi)			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)(vii)(A)			
			20.405(a)(1)(iv)			50.73(a)(2)(ii)			50.73(a)(2)(vii)(B)			
			20.405(a)(1)(v)			50.73(a)(2)(iii)			50.73(a)(2)(x)			

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Stephen B. Jones, Compliance Engineer	AREA CODE 2 0 5 7 2 9 - 1 2 5 1 3 8

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)	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	X				

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

During a review of surveillance requirements, it was determined that several instrument surveillances were not being performed in full compliance with technical specification. These omissions resulted from previous judgments that these surveillances were not required during refuel/shutdown conditions. The surveillances were subsequently completed with no problems. A general review of the surveillance scheduling instruction for accuracy will be performed.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES 8/31/90

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Browns Ferry - Unit 1	05000259	85	-050	-00	02	OF	02

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

Units 1 and 2 were in refueling outages, and unit 3 was in cold shutdown condition was identified. All three units were affected.

A management review of surveillance scheduling completed on October 3, 1985 discovered that several instrument surveillances were not performed in strict accordance with technical specification (TS) surveillance requirements when a unit is shut down for refueling. TS 3.2.B requires that the system be tested whenever the system is required by section 3.1. A conservative interpretation of section 3.5 provisions would require that functions serving the emergency core cooling systems be available in shutdown mode. Also, scram discharge valve testing required by TS 3.3.F, Scram Discharge Volume (AA), and 3.7.H, Containment Atmosphere Monitoring System H₂ Analyzer (IK) were also not required by the surveillance scheduling instruction (SI-1) when shut down. Subsequently, a review of the schedule during the current outage situation indicated several of these SIs had not been performed on each unit (see Attachment 1). Attachment 2 describes the purpose of the SIs not performed.

The root cause of this problem was the failure to fully implement TS requirements in plant procedures and personnel error in TS interpretation. In preparing the surveillance schedule, applicability of the SIs were determined by a logical need for the SI based on plant conditions rather than the literal meaning of TS.

All of the SIs not performed on units 1 and 3 were subsequently performed with the exception of SI 4.2.B.69 (Recirculation Pump Trip Reactor High Pressure) on unit 1. This was not performed because the recirculation pumps (AD) were not operating, and the reactor head had been removed. Unit 2 SIs were not performed because the fuel had been unloaded, and the applicable systems were no longer required by TS.

In order to prevent a similar problem from occurring, SI-1 is being reviewed for accuracy and will be revised to correctly implement TS requirements. Also, several of the SIs listed in Attachment 2 do not logically appear to be required in shutdown or refueling, and we will likely request TS relief in these areas. Licensed and technical personnel involved in surveillance scheduling will be briefed on problems and errors encountered in this event.

Unit 1 had been shut down since March 19, 1985, the reactor head had been removed, the reactor cavity was flooded when the SIs were not performed. Unit 2 had been shut down since September 15, 1984, when the SIs were not performed. Unit 3 had been shut down since March 9, 1985, with the head on and the vessel fueled.

Subsequent performance of each surveillance indicated that the operability of the instruments was not affected. The setpoints of the various instruments are based on design basis type events and substantial drifts would be necessary to adversely affect any events that could originate from cold shutdown conditions.

Responsible Plant Section - IM, NE

Previous Events - None

ATTACHMENT 1

Unit 1

<u>SI NUMBER</u>	<u>DATE MISSED</u>	<u>DATE PERFORMED</u> <u>SATISFACTORILY</u>
4.2.B.3	July 13, 1985	October 8, 1985
4.2.B.4	July 27, 1985	October 7, 1985
4.2.B.5	July 17, 1985	October 7, 1985
4.2.B.7	July 28, 1985	October 8, 1985
4.2.B.8	July 14, 1985	October 8, 1985
4.2.B.69	July 7, 1985	-----
4.3.F.1.b	July 31, 1985 August 30, 1985 September 27, 1985	October 10, 1985
4.7.H	July 15, 1985 August 14, 1985 September 11, 1985	October 8, 1985

Unit 2

<u>SI NUMBER</u>	<u>DATE MISSED</u>	<u>DATE PERFORMED</u> <u>SATISFACTORILY</u>
4.2.B.3	September 17, 1984	-----
4.2.B.8	September 18, 1984	-----
4.7.H	October 3, 1984	-----

Unit 2

<u>SI NUMBER</u>	<u>DATE MISSED</u>	<u>DATE PERFORMED</u> <u>SATISFACTORILY</u>
4.2.B.4	September 16, 1985	October 7, 1985
4.2.B.5	September 16, 1984	October 7, 1985
4.2.B.7	September 17, 1984	October 7, 1984
4.2.B.8	October 6, 1985	October 28, 1985
4.2.B.69	September 2, 1985	October 24, 1985

ATTACHMENT 2
DESCRIPTION OF SURVEILLANCE INSTRUCTIONS

- SI 4.2.B.3 - Instrumentation that initiates or controls core and containment cooling systems (CSCS) - Reactor low water level LITS 3-52, LITS 3-62

The level switch setpoint is 2/3 core height. Their function is to prevent operation of the containment (spray) system unless 2/3 of the core is covered.

- SI 4.2.B.4 - Instrumentation that Initiates or Controls the CSCS - Drywell Drywell High Pressure PS-64-58 (E-H)

The pressure switches are required to be set between 1 and 2.5 psig and prevent operation of containment spray below the trip setting.

- SI 4.2.B.5 - Instrumentation that Initiates or Controls the CSCS - High Drywell Pressure (PS 64-58 A-D)

The trip setting is less than or equal to 2.5 psig and initiates the core spray system (CSS) (BN), the high pressure coolant injection (HPCI) (BJ), and the low pressure coolant injection (LPCI) (BO).

- SI 4.2.B.7 - Reactor Low Pressure - Functional Test and Calibration

It is used to check PS 3-74 A and B and PS 68-95 and 96. Each switch has two sets of contacts. Switch 1 is set at 230 plus or minus 15 psi and gives an operative signal to close the recirculation discharge valves. Switch 2 is set at 450 plus or minus 15 psi and gives a permissive to open CSS admission valves, LPCI admission valves, and starting residual heat removal (RHR) pumps.

- SI 4.2.B.8 - Instrumentation that Initiates or Controls the CSCS - Reactor Pressure PS 68-93 and PS 68-94

The trip setting for these switches is 108 plus or minus 15 psig Switch 1 will close the RHR injection valves when a group 2 isolation occurs and the shutdown cooling mode of RHR is in service.

- SI 4.2.B.69 - Instrumentation that Initiates or Controls the CSCS - Reactor High Pressure

The trip setting for PS 3-204 (A-D) is less than or equal to 1120 psig. Above this setting, the recirculation pumps are tripped.

(Attachment 2 Continued)

SI 4.3.F.1.b - Scram Discharge Volume Valve Operability

This SI verifies the scram discharge volume vent and drain valves are operable.

SI 4.7.H - Containment Atmospheric Monitoring System H₂ Analyzers

This SI verifies that each hydrogen sensor is functioning properly.

TENNESSEE VALLEY AUTHORITY

Browns Ferry Nuclear Plant
P.O. Box 2000
Decatur, Alabama 35602

November 1, 1985

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

Dear Sir:

TENNESSEE VALLEY AUTHORITY - BROWNS FERRY NUCLEAR PLANT (BFN) UNIT 1 -
DOCKET NO. 50-259 - FACILITY OPERATING LICENSE DPR-33 - REPORTABLE
QCCURRENCE REPORT BFRO-50-259/85050

The enclosed report provides details concerning the failure to perform
surveillance instructions. This report is submitted in accordance with
10 CFR 50.73 (a)(2)(i).

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Robert L. Lewis
Robert L. Lewis
Acting Plant Manager
Browns Ferry Nuclear Plant

Enclosures

cc (Enclosures):
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NRC Resident Inspector, BFN

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