



TXU Electric
Comanche Peak
Steam Electric Station
P.O. Box 1002
Glen Rose, TX 76043
Tel: 254 897 8920
Fax: 254 897 6652
lterry1@txu.com

C. Lance Terry
Senior Vice President & Principal Nuclear Officer

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File # 10200
Ref. # 10CFR50.73(a)(2)(i)(B)

January 27, 2000

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2
DOCKET NO. 50-446
CONDITIONS PROHIBITED BY TECHNICAL SPECIFICATIONS
LICENSEE EVENT REPORT 446/00-001-00

Enclosed is Licensee Event Report (LER) 00-001-00 for Comanche Peak Steam Electric Station Unit 2, "18 Month Surveillance Testing For The Molded Case Circuit Breakers Was Exceeded Due To Less Than Adequate Scheduling Coordination."

There are no new licensing based commitments in the communication.

Sincerely,


C. L. Terry

OAB/oab
Enclosure

cc: Mr. E. W. Merschoff, Region IV
Mr. J. I. Tapia, Region IV
Resident Inspectors, CPSES

JE22

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)		

Facility Name (1) COMANCHE PEAK STEAM ELECTRIC STATION UNIT 2	Docket Number (2) 05000446	Page (3) 1 OF 4
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Title (4)
18 MONTH SURVEILLANCE TESTING FOR THE MOLDED CASE CIRCUIT BREAKERS WAS EXCEEDED DUE TO LESS THAN ADEQUATE SCHEDULING COORDINATION

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 Numbers
12	29	99	00	001	00	01	27	00	CPSES UNIT 1	05000445 05000

Operating Mode (9)	1	This report is submitted pursuant to the requirements of 10 CFR: (Check one or more) (11)							
Power Level (10)	100	<input type="checkbox"/> 20.2201 (b)	<input type="checkbox"/> 20.2203 (a) (2) (v)	<input checked="" type="checkbox"/> 50.73 (a) (2) (i)	<input type="checkbox"/> 50.73 (a) (2) (viii)				
		<input type="checkbox"/> 20.2203 (a) (1)	<input type="checkbox"/> 20.2203 (a) (3) (i)	<input type="checkbox"/> 50.73 (a) (2) (ii)	<input type="checkbox"/> 50.73 (a) (2) (x)				
		<input type="checkbox"/> 20.2203 (a) (2) (i)	<input type="checkbox"/> 20.2203 (a) (3) (ii)	<input type="checkbox"/> 50.73 (a) (2) (iii)	73.71				
		<input type="checkbox"/> 20.2203 (a) (2) (ii)	<input type="checkbox"/> 20.2203 (a) (4)	<input type="checkbox"/> 50.73 (a) (2) (iv)	OTHER				
		<input type="checkbox"/> 20.2203 (a) (2) (iii)	<input type="checkbox"/> 50.36 (c) (1)	<input type="checkbox"/> 50.73 (a) (2) (v)	Specify in Abstract below or in NRC Form 368A				
		<input type="checkbox"/> 20.2203 (a) (2) (iv)	<input type="checkbox"/> 50.36 (c) (2)	<input type="checkbox"/> 50.73 (a) (2) (vii)					

Licensee Contact For This LER (12) Name: R. D. Bird, Jr. - Plant Support Manager	Telephone Number (Include Area Code) (254)897-5267
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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
				N						

Supplemental Report Expected (14)				YES (If YES, complete EXPECTED SUBMISSION DATE)	X NO	EXPECTED SUBMISSION DATE (15)	Month	Day	Year

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

The Comanche Peak Steam Electric Station (CPSES) Technical Requirements Manual (TRM) section pertaining to subject molded case circuit breakers (TRS 13.8.32.2) requires functional testing of at least 10 percent of each type of applicable circuit breakers to be performed on a rotating basis with an 18-month frequency. On December 29, 1999, during a review of the work orders pertaining to the circuit breakers, it was discovered that certain breakers had exceeded the surveillance interval of 18 months in the past when this requirement was a part of the CPSES Technical Specifications (TS). Nevertheless, the up to date surveillances for both units were deemed to be within required Technical Requirements Manual (TRM) or the TS which were applicable at that time, hence, no immediate corrective actions were warranted.

The probable cause of the missed surveillance was deemed to be less than adequate surveillance scheduling process(s). Surveillance scheduling practices are being reviewed to determine enhancements to these practices.

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

I. DESCRIPTION OF REPORTABLE EVENT

A. REPORTABLE EVENT CLASSIFICATION

The requirements for the molded case circuit breakers are currently delineated in the CPSES Technical Requirement Manual. However, they were a part of the CPSES Technical Specifications when the missed surveillance occurred. Therefore, the reportable event classification was considered to be any operation prohibited by the plant's Technical Specification (10CFR50.73(a)(2)(i)(B)).

B. PLANT OPERATING CONDITIONS PRIOR TO THE EVENT

At time of discovery, on December 29, 1999, Comanche Peak Steam Electric Station (CPSES) Unit 2 was in Mode 1, Power Operations.

C. STATUS OF STRUCTURES, SYSTEMS, OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

It was determined that the Containment Penetration Conductor Overcurrent Protection Devices, which contain these molded case circuit breakers, were operable. No other structures, systems or components that were inoperable contributed to the event.

D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES

On December 29, 1999, during a review of the work orders pertaining to the molded case circuit breakers, it was discovered that certain breakers had exceeded the surveillance interval of 18 months in the past.

The required surveillance tests for the molded circuit breakers (types; EB110, FH, LH, KH, QOB and FY) were completed under a single work order. These tests were performed during the time frame of June 9, 1997 and November 1997. Based on the earliest testing of the breakers in these groups, the next 18-month surveillance testing should have been scheduled to occur between June 9, 1997 until April 27, 1999. However, because the work order was closed (or entered in the computerized work order database) on December 1, 1997 instead of June 9, 1997, the next 18-month interval violation date was automatically calculated to occur by October 19, 1999 instead of April 27, 1999. This led to the infringement of the required 18-month surveillance interval.

This placed the plant in a condition prohibited by Plant Technical Specification during the periods when the LCO was applicable; and therefore is reportable pursuant to the requirements of 10CFR50.73(a)(2)(i)(B).

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E. THE METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE, OR PROCEDURAL OR PERSONNEL ERROR

On December 29, 1999, during a review of the work orders by work control personnel (utility, non-licensed) pertaining to the molded case circuit breakers, it was discovered that certain breakers had exceeded their surveillance interval of 18 months in the past.

II. COMPONENT OR SYSTEM FAILURES

A. FAILURE MODE, MECHANISM, AND EFFECTS OF EACH FAILED COMPONENT

Not Applicable - No failure mode, mechanism, and effects of each component are applicable.

B. DURATION OF SAFETY SYSTEM TRAIN INOPERABILITY

Not Applicable - No safety system train inoperability was determined.

C. SAFETY CONSEQUENCES AND IMPLICATIONS

The Containment electrical penetrations and penetration conductors are protected by either deenergizing circuits not required during reactor operations or by demonstrating the OPERABILITY of primary and backup overcurrent circuit breakers during periodic surveillance such as the subject molded case circuit breakers. After it was established that the surveillances indeed missed their required periodicity, it was also ascertained that the up to date surveillance was current. There is no evidence that the molded case circuit breakers were degraded or not functional during the time period their surveillance requirements were in violation. Based on this assessment, it is concluded that the health and safety of the public would not have been affected by the conditions described above.

III. CAUSE OF THE EVENT

The cause of the missed surveillance was deemed to be less than adequate scheduling by the surveillance coordinator.

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IV. CORRECTIVE ACTIONS

Immediate corrective actions were to review the up to date surveillance to ensure they were current and in compliance with the TS requirements, for both units. No matters of concern were identified. Surveillance scheduling practices are being reviewed to determine enhancements to these practices.

V. PREVIOUS SIMILAR EVENTS

There have been other events that involve less than adequate scheduling leading to a missed TS surveillance. However, the periodicity issues involving the subject molded case circuit breakers appear to be an isolated occurrence. The corrective actions taken for the previous events would have not precluded the subject event.