



Exelon Generation.

Clinton Power Station
8401 Power Road
Clinton, IL 61727

U-604334
March 6, 2017

10CFR50.73
SRRS 5A.108

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Subject: Licensee Event Report 2016-010-01

Enclosed is Licensee Event Report (LER) 2016-010-01: Failure to Complete Technical Specification Required Actions within the Completion Time Resulted in a Condition Prohibited by Technical Specifications. This report is being submitted in accordance with the requirements of 10 CFR 50.73 and is a follow up to LER 2016-010-00 provided on December 13, 2016. Revision bars are provided in the margins to denote modifications made to the content of the LER since the previous submittal.

There are no regulatory commitments contained in this report.

Should you have any questions concerning this report, please contact Mr. Dale Shelton, Regulatory Assurance Manager, at (217) 937-2800.

Respectfully,

Theodore R. Stoner
Site Vice President
Clinton Power Station

KP/cac

Attachment: Licensee Event Report 2016-010-01

cc:

Regional Administrator— NRC Region III
NRC Senior Resident Inspector - Clinton Power Station
Office of Nuclear Facility Safety — Illinois Emergency Management Agency

IEZZ
NRR



LICENSEE EVENT REPORT (LER)
(See Page 2 for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

| | | |
|--|-------------------------------------|--------------------------|
| 1. FACILITY NAME Clinton Power Station, Unit 1 | 2. DOCKET NUMBER 05000461 | 3. PAGE 1 OF 3 |
|--|-------------------------------------|--------------------------|

4. TITLE
Failure to Complete Technical Specification Required Actions within the Completion Time Resulted in a Condition Prohibited by Technical Specifications

| 5. EVENT DATE | | | 6. LER NUMBER | | | 7. REPORT DATE | | | 8. OTHER FACILITIES INVOLVED | |
|---------------|-----|------|---------------|-------------------|---------|----------------|-----|------|------------------------------|---------------|
| MONTH | DAY | YEAR | YEAR | SEQUENTIAL NUMBER | REV NO. | MONTH | DAY | YEAR | FACILITY NAME | DOCKET NUMBER |
| 10 | 14 | 2016 | 2016 | 010 | 01 | 03 | 06 | 2017 | | 05000 |
| | | | | | | | | | FACILITY NAME | DOCKET NUMBER |
| | | | | | | | | | | 05000 |

| | | | | |
|-----------------------------------|--|---|---|---|
| 9. OPERATING MODE | 11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply) | | | |
| 1 | <input type="checkbox"/> 20.2201(b) | <input type="checkbox"/> 20.2203(a)(3)(i) | <input type="checkbox"/> 50.73(a)(2)(ii)(A) | <input type="checkbox"/> 50.73(a)(2)(viii)(A) |
| | <input type="checkbox"/> 20.2201(d) | <input type="checkbox"/> 20.2203(a)(3)(ii) | <input type="checkbox"/> 50.73(a)(2)(ii)(B) | <input type="checkbox"/> 50.73(a)(2)(viii)(B) |
| | <input type="checkbox"/> 20.2203(a)(1) | <input type="checkbox"/> 20.2203(a)(4) | <input type="checkbox"/> 50.73(a)(2)(iii) | <input type="checkbox"/> 50.73(a)(2)(ix)(A) |
| | <input type="checkbox"/> 20.2203(a)(2)(i) | <input type="checkbox"/> 50.36(c)(1)(i)(A) | <input type="checkbox"/> 50.73(a)(2)(iv)(A) | <input type="checkbox"/> 50.73(a)(2)(x) |
| 10. POWER LEVEL 099 | <input type="checkbox"/> 20.2203(a)(2)(ii) | <input type="checkbox"/> 50.36(c)(1)(ii)(A) | <input type="checkbox"/> 50.73(a)(2)(v)(A) | <input type="checkbox"/> 73.71(a)(4) |
| | <input type="checkbox"/> 20.2203(a)(2)(iii) | <input type="checkbox"/> 50.36(c)(2) | <input type="checkbox"/> 50.73(a)(2)(v)(B) | <input type="checkbox"/> 73.71(a)(5) |
| | <input type="checkbox"/> 20.2203(a)(2)(iv) | <input type="checkbox"/> 50.46(a)(3)(ii) | <input type="checkbox"/> 50.73(a)(2)(v)(C) | <input type="checkbox"/> 73.77(a)(1) |
| | <input type="checkbox"/> 20.2203(a)(2)(v) | <input type="checkbox"/> 50.73(a)(2)(i)(A) | <input type="checkbox"/> 50.73(a)(2)(v)(D) | <input type="checkbox"/> 73.77(a)(2)(i) |
| | <input type="checkbox"/> 20.2203(a)(2)(vi) | <input checked="" type="checkbox"/> 50.73(a)(2)(i)(B) | <input type="checkbox"/> 50.73(a)(2)(vii) | <input type="checkbox"/> 73.77(a)(2)(ii) |
| | <input type="checkbox"/> 50.73(a)(2)(i)(C) | <input type="checkbox"/> OTHER | Specify in Abstract below or in NRC Form 366A | |

12. LICENSEE CONTACT FOR THIS LER

| | |
|---|--|
| LICENSEE CONTACT Dale A. Shelton, Regulatory Assurance Manager | TELEPHONE NUMBER (Include Area Code) 217-937-2800 |
|---|--|

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

| CAUSE | SYSTEM | COMPONENT | MANU-FACTURER | REPORTABLE TO EPIX | CAUSE | SYSTEM | COMPONENT | MANU-FACTURER | REPORTABLE TO EPIX |
|-------|--------|-----------|---------------|--------------------|-------|--------|-----------|---------------|--------------------|
| | | | | | | | | | |

| | | | | |
|--|-------------------------------------|-------|-----|------|
| 14. SUPPLEMENTAL REPORT EXPECTED <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO | 15. EXPECTED SUBMISSION DATE | MONTH | DAY | YEAR |
| | | | | |

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

On October 14, 2016, Clinton Power Station (CPS) determined subsequent to the 3rd Quarter NRC Exit Meeting that a condition prohibited by Technical Specification (TS) 3.7.6, "Main Turbine Bypass System," had occurred associated with a failure to complete a TS Required Action within the associated Completion Time. Specifically, testing of Main Steam Turbine Bypass Valve (TBV) Numbers 4, 5, and 6 was not performed within the required test interval and the TBVs were appropriately declared inoperable as required by TS Surveillance Requirement (SR) 3.0.1. Thermal Limit penalties were applied as required by Limiting Condition for Operation (LCO) 3.7.6. A Surveillance Frequency Change was processed in accordance with TS Program 5.5.16, "Surveillance Frequency Control Program," in June 2016 to change the Frequency for SR 3.7.6.1 from 31 days to 12 months. TBVs 5 and 6 were subsequently declared OPERABLE and the thermal limit penalties removed without performing the required SR 3.7.6.1, contrary to TS SR 3.0.1 Bases. The apparent cause of this event was determined to be that no specific requirement exists in either plant procedures or industry guidance which prohibits declaring a component or system OPERABLE based solely on an extension of the required surveillance test interval. Corrective actions include testing the valves with an alternate method and completing administrative procedure changes. This event is reportable under 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by TS.



**LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET**

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

| 1. FACILITY NAME | 2. DOCKET NUMBER | 3. LER NUMBER | | |
|-------------------------------|------------------|---------------|-------------------|---------|
| | | YEAR | SEQUENTIAL NUMBER | REV NO. |
| Clinton Power Station, Unit 1 | 05000461 | 2016 | - 010 | - 01 |

NARRATIVE

PLANT AND SYSTEM IDENTIFICATION

General Electric—Boiling Water Reactor, 3473 Megawatts Thermal Rated Core Power Energy Industry Identification System (EIS) codes are identified in the text as [XX]

EVENT IDENTIFICATION

Failure to Complete Technical Specification Required Actions within the Completion Time Resulted in a Condition Prohibited by Technical Specifications

A. Plant Operating Conditions before the Event

Unit: 1 Event Date: 10/14/16 Event Time: 0830
 Mode: 1 Mode Name: Power Operation Reactor Power: 99 percent

B. DESCRIPTION OF EVENT

On October 14, 2016, Clinton Power Station (CPS) determined subsequent to the 3rd Quarter NRC Exit Meeting that a condition prohibited by Technical Specification (TS) 3.7.6, "Main Turbine Bypass System," had occurred associated with a failure to complete a TS Required Action within the associated Completion Time. Specifically, on June 6, 2016, the TS Limiting Condition for Operations (LCO) Surveillance Requirement (SR) 3.0.2 grace period of 1.25 times the normal required Frequency (31 days) for completing testing of the Main Steam Bypass Valves per SR 3.7.6.1 was exceeded for the Main Turbine Bypass System. Turbine Bypass Valves (TBV) 4, 5, and 6 were not tested within the required Frequency and the valves were declared inoperable as required by TS SR 3.0.1. Thermal Limit penalties were applied as required by LCO 3.7.6.

On July 7, 2016, a Surveillance Frequency Change was processed in accordance with TS Program 5.5.16, "Surveillance Frequency Control Program," for TS SR 3.7.6.1 to change the required Frequency from 31 days to 12 months. The last performance credit date of the TBV test was April 28, 2016. This new revision changed the due date for testing the TBVs to April 28, 2017. With TBV testing performed within the new required interval, the valves were declared OPERABLE and the Thermal Limit penalties removed without performing the required SR 3.7.6.1. It was subsequently determined, however, that in accordance with TS SR 3.0.1 Bases, the Surveillance had to be met and performed in accordance with SR 3.0.2 prior to returning equipment to OPERABLE status.

The failure to perform the TS SR within the test interval without applying the Actions of TS 3.7.6 was a condition prohibited by TS.



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NARRATIVE

A surveillance test for TBVs 4, 5, and 6 was satisfactorily completed on September 28, 2016 using an alternate methodology.

C. CAUSE OF EVENT

No specific requirement exists in either Exelon administrative procedures or NEI 04-10, "Risk Informed Technical Specifications," which prohibits declaring a component or system OPERABLE based solely on an extension of the required surveillance test interval. Licensed operator staff incorrectly interpreted TS SR 3.0.1 Bases based on the guidance provided in OP-AA-108-106, "Equipment Return to Service."

D. SAFETY ANALYSIS

There were no safety consequences associated with the event described in this report since no thermal limits were exceeded during the time the thermal limit penalty was not invoked. A subsequent surveillance test of TBVs 4, 5, and 6 was satisfactorily completed on September 26, 2016, using an alternate test method, demonstrating that the TBVs would have properly responded to an event. The ability of the plant to safely shutdown was not affected as a result of the conditions described in this report.

E. CORRECTIVE ACTIONS

Turbine Bypass Valves 4, 5, and 6 were satisfactorily tested on September 28, 2016 using an alternate test methodology. The insight gained from this event was shared with on-shift licensed operators and the Exelon Operations peer group. Operating procedure changes are being made to ensure the requirements of SR 3.0.1 are clear regarding implementation of surveillance frequency changes.

F. PREVIOUS SIMILAR OCCURENCES

There were no previous occurrences associated with this event.

G. COMPONENT FAILURE DATA

There was not a component failure associated with this event.