



PEACH BOTTOM—THE POWER OF EXCELLENCE

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION

R. D. 1, Box 208

Delta, Pennsylvania 17314

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D. B. Miller, Jr.
Vice President

June 27, 1990

Docket No. 50-277

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

SUBJECT: Licensee Event Report
Peach Bottom Atomic Power Station - Unit 2

This LER concerns a failure to perform a Tech Spec Surveillance due to a procedural deficiency.

Reference:	Docket No. 50-277
Report Number:	2-90-013
Revision Number:	00
Event Date:	11/30/89
Discovery Date:	05/30/90
Report Date:	06/27/90
Facility:	Peach Bottom Atomic Power Station RD 1, Box 208, Delta, PA 17314

This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B).

Sincerely,

cc: J. J. Lyash, USNRC Senior Resident Inspector
T. T. Martin, USNRC, Region I

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Peach Bottom Atomic Power Station - Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 2 7 7	PAGE (3) 1 OF 0 3
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TITLE (4)
Failure To Perform A Technical Specification Surveillance Due To A Procedural Deficiency

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(S)		DOCKET NUMBER(S)
11	30	89	90	013	00	06	27	90			0 5 0 0 0
0 5 0 0 0											

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)

OPERATING MODE (9) N	20.402(b)	20.406(c)	80.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10) 0 0 0	20.405(a)(1)(ii)	80.36(a)(1)	80.73(a)(2)(v)	73.71(c)
	20.405(a)(1)(iii)	80.36(a)(2)	80.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.405(a)(1)(iv)	X 80.73(a)(2)(ii)	80.73(a)(2)(vii)(A)		
20.405(a)(1)(v)	80.73(a)(2)(iii)	80.73(a)(2)(vii)(B)		
20.405(a)(1)(vi)	80.73(a)(2)(iv)	80.73(a)(2)(iii)	80.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME A. A. Pulvio, Regulatory Engineer	TELEPHONE NUMBER 7 1 7 4 5 6 - 7 0 1 4
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRCDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRCDS

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 fifteen single-space typewritten lines) (16)

On 5/30/90, during a test revision of the drywell fire detection instrumentation circuits surveillance test (ST), it was identified that the tests were not written to allow testing in accordance with Technical Specification (Tech Spec) 4.14.C.1.c and had not been performed in the required periodicity. ST 15.4B-2 and ST 15.5B-2 are required to be performed every 6 months. A review of the last performances indicated that the Unit 2 tests went out of surveillance on 11/30/89.

The root cause was an incorrect standard practice of only performing the test when shutdown. Consequently, the surveillance test was not completed within its specified interval.

A review indicated that the Unit 2 and Unit 3 tests were in surveillance at the time of discovery. There were no actual safety consequences as a result of this event.

The tests have been revised to clarify the testing requirements of Tech Spec 4.14.C.1.c and other smoke and heat detector tests have been reviewed and revised as required.

There were two previous similar events identified. A task force has been established to perform a root cause analysis on the generic issue of missed STs and assess the corrective actions taken as a result of previous events.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Peach Bottom Atomic Power Station Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 2 7 7	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 0	— 0 1 3	— 0 0	0 2	OF	0 3

TEXT (If more space is required, use additional NRC Form 306A's) (17)

Requirements for the Report:

This report is required per 10 CFR 50.73(a)(2)(i)(B) due to surveillances not being performed when required by Technical Specifications (Tech Specs).

Unit Conditions at Time of Event:

Unit 2 was in the Refuel Mode at 0% of rated thermal reactor (EIIS:RPV) power.

There were no systems, structures, or components that were inoperable that contributed to this event.

Description of Event:

While performing a procedure revision on 5/30/90, 0730 hours, it was discovered that two surveillances were not being performed in a periodicity as required by Tech Spec 4.14.C.1.c. The surveillance tests (STs) not performed were ST 15.4.B-2 "Functional Test of Unit 2 Drywell Central/South Area Smoke Detectors", and ST 15.5B-2 "Functional Test of Unit 2 Drywell South Area Smoke Detectors". Tech Spec 4.14.C.1.c requires that the supervised circuit between the local panel and the control room of the required fire detection instrumentation (EIIS:IC) listed in Tech Spec Table 3.14.C.1 shall be demonstrated operable at least once per 6 months. These instruments are required to be operable when the equipment in that area is required to be operable. The same surveillances also satisfy Tech Spec 4.14.C.1.a by functionally testing the smoke detectors (EIIS:DET). Tech Spec 4.14.C.2 allows functional testing of the smoke detectors to be delayed until they are accessible. Although the detectors were inaccessible, the supervised circuit was accessible and that portion of the procedure could have been performed.

The event was discovered during the initial draft of the STs to support the ST Rewrite Project. The stated frequency did not clearly represent the requirements of Tech Spec 4.14.C.1.c.

Cause of the Event:

The root cause was an incorrect standard practice of only performing the tests when the drywell was accessible (i.e., shutdown). Heretofore, it was believed that the surveillances were only required to be performed when the instrumentation itself was accessible (Tech Spec 4.14.C.2). The test frequency did not clearly define that the test satisfied Tech Spec 4.14.C.1.c as well as 4.14.C.1.a. One procedure was used to test both the instrumentation and the supervised circuit. Whenever the instrumentation was not accessible, all parts of the test were delayed until access was available. Consequently, the surveillance tests were not completed within their specified interval.

Analysis of the Event:

No actual safety consequences occurred as a result of this event.

The event was discovered on 5/30/90. The Unit 2 tests went out of surveillance on 11/30/89. A review of the last performances of the surveillances was conducted. The

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FACILITY NAME (1) Peach Bottom Atomic Power Station Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 2 7 7	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 0	0 1 3	0 0	0 3	OF	0 3

TEXT (If more space is required, use additional NRC Form 306A's) (17)

Unit 2 tests were completed satisfactorily on 3/10/90, four months later than required. The last performances of the Unit 3 surveillances were in the proper periodicity. At the time of discovery the Unit 2 and the Unit 3 tests were found to be in surveillance.

This event is considered to be of minimal safety significance. Both units were in surveillance at the time of discovery. The detectors which this circuit supervises are inside the primary containment (E11S:BD). During power operation the area is inerted and would not support combustion.

Corrective Actions:

The tests have been revised to clarify the testing requirements of Tech Spec 4.14.C.1.c.

Other smoke and heat detector tests have been reviewed for similar problems and revised as needed.

A task force has been established to perform a root cause analysis on the generic issue of missed STs.

Previous Similar Events:

Two previous similar LERs were identified. LER 3-89-11 and LER 2-90-09. Both indicated a programmatic deficiency in that it was an incorrect standard practice in the performance of the surveillances. Due to the number of missed surveillance tests in the last two years a task force has been established to perform a root cause analysis. Corrective actions taken in LER 3-89-11 and 2-90-09 did not prevent this event because they consisted of a review of surveillances associated with meeting an operational milestone.