CCN-90-14130



PEACH BOTTOM-THE POWER OF EXCELLENCE

D. B. Miller, Jr. Vice President PHILADELPHIA ELECTRIC COMPANY PEACH BOTTOM ATOMIC POWER STATION R. D. 1. Box 208 Delta, Pennsylvania 17314 (717) 456-7014

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  $\frac{12}{50.73}$  (a)(2)(i)(B).

Sincerely,

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

9007030037 900627 PDR ADOCK 05000277 PDC PDC

E22

Description       Description <thdescription< th=""> <thdescription< th=""></thdescription<></thdescription<>	NRC Form 366 19-63		LICI	ENSEE EVE	NT RE	PORT	(LER)		CLEAR REQULATO	
THERE         Pailure To Perform A Technical Specification Surveillance Due To A Procedural Deficiency         Control Data Str.	FACILITY NAME (1)						1	DOCKET NUMBER	(2)	PAGE (3)
Pailure To Perform A Technical Specification Surveillance Due To A Proceedural Deficiency	Peach Botton	n Atomic Power	Station	- Unit 2				0   5   0   0	0 2 7 7	1 OF 0 13
Under East 00       Let Number 0       Under East 00       Child P Addition 0        Child P Addit </td <td>TITLE (A)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>	TITLE (A)									
ADDATE       Tetal       Tetal       Tetal       Tetal       Tetal       Tetal       ODATE       Tetal       ODATE       ODATE <t< td=""><td>Failure To Pe</td><td>erform A Techn:</td><td>ical Spec</td><td>cification</td><td>Surv</td><td>eillar</td><td>nce Due T</td><td>o A Proce</td><td>dural Def</td><td>iciency</td></t<>	Failure To Pe	erform A Techn:	ical Spec	cification	Surv	eillar	nce Due T	o A Proce	dural Def	iciency
Building of the first of t	EVENT DATE (6)	and the second particular second s		REPORT DATE	(7)		STREET, STREET	and the second division of the second states	the sum the state of the state of the state of	
12       3       0       9       0       1       3       0       0       6       2       9       0       0       6       0	MONTH DAY YEAR	YEAR BEQUENTIAL		MONTH DAY	YEAR		FACILITY NAM	AK.S	DOCKET NUMBER	((\$)
OPERATION       Non-Althon & BLOWENTED FURNELIST TO THE BLOWENDER OF THE					-				0 15 0 10	10111
OPERATION       Non-Althon & BLOWENTED FURNELIST TO THE BLOWENDER OF THE				ala da	10					
Description       No.       Participation       <	1113089		aharand was relevant	and maker it with	mich marks				his without he combined	10111
100       1		and the second second second second second	D PURSUANT TI		NTS OF 10	CFR 9 10		of the following/ (11		
And       Display       Researching       Researching <thresearching< thr="">       Researching       Re</thresearching<>		and and a second se	-			-			and the second	
All of the second se	LEVEL	and the second se	-			-		영문학 위험 영	and the second se	with in Abstract
A. A. Pulvio, Regulatory Engineer       YELEFRONT FOR THE LEFT (2)         A. A. Pulvio, Regulatory Engineer       YELEFRONT FOR THE LEFT (2)         A. A. Pulvio, Regulatory Engineer       YELEFRONT FOR THE LEFT (2)         Cause Content of the Left (2)       Cause Content for the Left (2)         Regulatory Engineer       YELEFRONT FOR THE LEFT (2)         Cause Content of the Left (2)       Cause Content of the Left (2)         Cause Content of the Left (2)       Cause Content of the Left (2)         BURFLEMENTA REFORMED 14       Cause State         BURFLEMENTA REFORMED 14       Cause State         Cause Content of the Left (2)       Cause State         BURFLEMENTA REFORMED 14       Execution State         ABURTACT Class State       Execution State         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 Spec	(10) 01010	and the second se	V						below and it	
ALL       Description       Description       Description         ALL       LICENSEE CONTACT FOR THIS LEFT (22)       TELEFHORE MOMENT         ALL       A. A. Pulvio, Regulatory Engineer       7(1)7(1)7(1)7(1)7(1)7(1)7(1)7(1)7(1)7(1)			-						Contrast,	
A. A. Fulvio, Regulatory Engineer A. A. Fulvio, Regulatory Engineer COMPLETE DNE LINE FOR EACH COMPONENT FAILURE DESCRIPTION TO COMPLETE DNE LINE FOR EACH COMPONENT FAILURE DESCRIPTION TO COMPLETE DNE LINE FOR EACH COMPONENT FAILURE DESCRIPTION TO COMPLETE DNE LINE FOR EACH COMPONENT FAILURE DESCRIPTION TO CAUSE CLIERE COMPONENT ABUTACCOMPONENT AUTOR COMPONENT COMPLETE DNE LINE FOR EACH COMPONENT FAILURE DESCRIPTION TO COMPONENT AUTOR COMPONENT AUTOR COMPONENT COMPLETE DNE LINE FOR EACH COMPONENT FAILURE DESCRIPTION TO COMPONENT AUTOR COMPONENT AUTOR COMPONENT									10.000	
NAME       The Pulvio, Regulatory Engineer       The Pulvio, Regulatory Engineer       The Pulvio, Regulatory Engineer         CAUSE       COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS FRENCY 13       Cause vistem       CAUSE vistem       COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS FRENCY 13         CAUSE       COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS FRENCY 13       CAUSE vistem       COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS FRENCY 13         CAUSE       COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS FRENCY 13       CAUSE vistem       CAUSE vistem         CAUSE       COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THE COMPONENT WITH THE COMPONENT FAILURE DESCRIPTION TO THE FRANCE COMPONENT FAILURE DESCRIPTION TO THE FAILURE DESCRIPTION THE FAILURE DESCRIPTION TO THE FAILURE DESC			h		FOR THIS	LER (12)				
A. A. Pulvio, Regulatory Engineer       7117       415       61-7       0114         COMMENT FOR LINE FOR EACH COMPONENT FAILURE DESCRIPTED IN THE REPORT 100         CAUSE SYSTEM COMPONENT         COMMENT       MULLE FOR EACH COMPONENT FAILURE DESCRIPTED IN THE REPORT 100         CAUSE SYSTEM COMPONENT       MEDITARIE         CAUSE SYSTEM COMPONENT       MEDITARIE         MULTE COMPONENT       MEDITARIE         AUGUSTION DATE         AUGUSTION DATE         MULTE COMPONENT FAILURE DESCRIPTION INFORMATION OF THE REPORT AUGUSTION DATE         MULTE COMPONENT FAILURE DESCRIPTION INFORMATION OF THE REPORT AUGUSTION DATE         AUGUSTION DATE         MULTE COMPONENT FAILURE DESCRIPTION INFORMATION OF THE REPORT INFORMATION OF THE REPORT AUGUSTION DATE         MULTE COMPONENT FAILURE DESCRIPTION OF THE REPORT INFORMATION         AUGUSTION DATE         MULTE COMPONENT FAILURE DESCRIPTION OF THE REPORT AUGUSTION DATE         MULTE COMPONENT FAILURE DESCRIPTION         AUGUSTION DATE         AUGUSTION DATE         MULTE COMPONENT FAILURE DESCRIPTION         MULTE COMPONENT FAILURE DESCRIPTION <th< td=""><td>NAME</td><td></td><td></td><td>Cardinate and a local design of the</td><td></td><td></td><td></td><td></td><td>TELEPHONE NUM</td><td>BER</td></th<>	NAME			Cardinate and a local design of the					TELEPHONE NUM	BER
Construction for the formation 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 every 6 months. A review of the last 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.         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         A1.4.C.1.c and heat detector tests have been reviewed and revised as required.								AREA CODE		
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THE REPORT 100         CAUSE COMPONENT         CAUSE COMPONENT         CAUSE COMPONENT         CAUSE COMPONENT         CAUSE COMPONENT         CAUSE COMPONENT      CAUSE EVERTED COMPONENT         CAUSE EVERTED COMPONENT         CAUSE EVERTED COMPONENT         CAUSE EVERTED COMPONENT         CAUSE EVERTED COMPONENT         CAUSE EVERTED COMPONENT         CAUSE EVERTED COMPONENT         MONTH COMPONENT         BUPPLEMENTAL REPORT EXPECTED 140         EVENTUARY EXPECTED 2004MISSION DATE         X       NO         ADDATE       MONTH DATE         VERTURE COMPONENT FAILE       MONTH DATE         VERTURE COMPONENT FAILE         VERTURE COMPONENT FAILE         ADDATE         MONTH DATE         ADDATE         VERTURE COMPONENT FAILE         VERTURE COMPONENT FAILE         VERTURE COMPONENT FAILE         VERTURE COMPONENT FA	A. A. Ful	lvio, Regulator	ry Engine	ber				71117	415161-	17 101114
CAUSE 012160       CONSIDER       TO MERGE       TO MERGE       TO MERGE       TO MERGE       TO MERGE         Image: Construction       Image: Construction       Image: Construction       Image: Construction       To MERGE       To MERGE         Image: Construction       Image:		COMPLETE	ONE LINE FOR	EACH COMPONENT	FAILURE	DESCRIBE	D IN THIS REPOR	T (13)	• • • •- •- •- ••	daan
ABSTRACT LINE CONDUCTE STREETED 140       EXECUTED         VEB.IT vel. compare EXECTED SUBMISSION DATE       X         ABSTRACT LINE CONTENT EXPECTED 140       EXECUTED         VEB.IT vel. compare EXECTED SUBMISSION DATE       X         ABSTRACT LINE to 1400 uses 14 accordance with Technical Specification (Tech Spec) 4.14.C.1.c and had not been performed in the required periodicity. ST 15.48-2 and ST 15.58-2 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	CAUSE SYSTEM COMPO				CAUSE	SYSTEM	COMPONENT			
VES. If yes, compare EXPECTED SUBMISSION DATE!       X       NO         ABSTRACT LIMIT to 1400 goes, is approximately inter unprimer to provide 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 15.48-2 and ST 15.58-2 are required to be performed every 6 months. A review of the last 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 not 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								1.1.1		
VEB.(1) yes, compare EXPECTED BURMISSION DATE) X NO ABSTRACT LUMIC to 1400 uses, is approximately three unprogrammer for 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 15.48-2 and ST 15.58-2 are required to be performed every 6 months. A review of the last performances indicated that the Unit 2 tests went out of surveillance 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	have been a second second second second	kannaken ak oon kuna kanaken		**********************			ananaka makan makana	ale too ale unité d'arakan		******
VEB.(1) yes, compare EXPECTED BURMISSION DATE) X NO ABSTRACT LUMIC to 1400 uses, is approximately three unprogrammer for 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 15.48-2 and ST 15.58-2 are required to be performed every 6 months. A review of the last performances indicated that the Unit 2 tests went out of surveillance 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						1		I I I I	d a de la com	
VES (If yes, compare EXPECTED SUBMISSION DATE) X NO ABSTRACT Lines to 1400 waves, a supersonate, littles wave transmitter little 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		BUPPLEMI	INTAL REPORT	EXPECTED (14)				EXPECTE		DAY YEAR
ABBERAGE (London of 100 used is approximate) three imposible to 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 15.48-2 and ST 15.58-2 are required to be performed every 6 months. A review of the last performances indicated that the Unit 2 tests went out of surveillance to 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 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								SUBMISSI	ON I	REFE ROLL
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 15.48-2 and ST 15.58-2 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				and the second second						
전성 방법에 가장하는 것이 것이 못했다. 아이지 않는 것은 것은 것은 것은 것은 것이 하는 것이 것이 것이 같이 같이 같이 같이 같이 같이 같이 같이 했다. 나는 것이 같이 많이	circuits surv allow testing had not been required to b that the Unit The root caus shutdown. Co interval. A review indi of discovery. The tests hav 4.14.C.1.c an required. There were tw to perform a	veillance test performed in t be performed ev 2 tests went se was an incor onsequently, th cated that the There were r ve been revised d other smoke	(ST), it e with Te the requi- very 6 mo out of s rrect stane survei e Unit 2 no actual d to clar and heat milar eve alysis or	t was iden echnical S ired period onths. A f surveilland andard prad illance ter and Unit I safety co rify the ter t detector	tified pecifi dicity review ce on ctice st was 3 test onseque tests ified. ric is	of that icatio . ST v of t 11/30 of on s not ts wer uences o reques have . A t ssue o	the test in (Tech S 15.4B-2 he last p //89. hy perfor completed is in surv as a res irements been rev ask force f missed	ts were no spec) 4.14 and ST 15 performance ming the d within the veillance sult of the of Tech S viewed and e has been	ot writter 4.C.1.c ar 5.5B-2 are ces indice test when its specif at the t his event. Spec d revised h establis	ated fied as shed

NRC Form 366 (9-83)

LICENSEE F	EVENT	REPORT	(LER) TEXT	CONTINUATION
------------	-------	--------	------------	--------------

U.S. NUCLEAR REGULATORY COMMISSION

APPROV	ED OMB	NO. 31	50-01
EXPIRES	8/31/88		

FACILITY NAME (1)	DOCKET NUMBER (2)		L	ER NUMBER	PAGE (3)				
Peach Bottom Atomic Power Station Unit 2	0 5 0 0 0 2 7	7 910		O 11			1	OF	013

EXT III more spece is required, use additional NAC Form 366.4's) (17

INC Form 306A

## Requirements for the Report:

This report is required per 10 CFR 50.73(a)(2)(1)(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 15.4.6-2 "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 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

LICENSEE EVENT REPORT (LER) TEXT CO	NTINUATION	L
-------------------------------------	------------	---

U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104

EXPIRES: \$/31/10

FACIEITY NAME (1)	DOCKET NUMBER (2)									LER NUMBER (6)									PAGE (3)		
Peach Bottom Atomic Power Station Unit 2											YE	AR	_	SEON	UENT	R		NUMBER			
	0	1	5	0	0	10	12	1	7	17	91	0		0	11	3	-	010	03	OF	0 3

TEXT (If more space is required, use additional NRC Form 2064's) (17)

NAC Form 366A

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 (EIIS: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 genemic 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 sur flance 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.