

South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

August 1, 2012 NOC-AE-12002891 File No.: G25

10 CFR 50.73 STI: 33577470

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555-0001

South Texas Project
Unit 1
Docket No. STN 50-498
Revision 1 of Licensee Event Report 1-2012-001
Nuclear Instrumentation Channel NI-45A Failed Channel Check

Reference: Letter dated May 31, 2012, from G. T. Powell, STPNOC, to NRC Document Control

Desk, "Licensee Event Report 1-2012-001 Nuclear Instrumentation Channel NI-45A

Failed Channel Check," (NOC-AE-12002857) (ML12178A064)

Pursuant to 10 CFR 50.73, STP Nuclear Operating Company (STPNOC) submits the attached revision to the Unit 1 Licensee Event Report (LER) 1-2012-001 regarding the inoperability of Extended Range (E/R) Flux Lower Range Nuclear Instrument (NI-45A). This event is considered reportable pursuant to 10 CFR 50.73(a)(2)(i)(B), as any operation or condition that was prohibited by the plant's Technical Specifications.

This event did not have an adverse effect on the health and safety of the public.

The attached LER revision provides the results of the Root Cause Evaluation for this event and the associated corrective actions.

There are no commitments contained in this LER. Corrective actions will be implemented in accordance with the STP Corrective Action Program.

If there are any questions on this submittal, please contact either Joe Loya at (361) 972-8005 or me at (361) 972-7566.

. W. Rencurrel

Chief Nuclear Officer

JAL

Attachment: LER 1-2012-001 Rev. 1

CC:

(paper copy)

Regional Administrator, Region IV U. S. Nuclear Regulatory Commission 1600 East Lamar Boulevard Arlington, TX 76011-4511

Balwant K. Singal Senior Project Manager U.S. Nuclear Regulatory Commission One White Flint North (MS 8 B1) 11555 Rockville Pike Rockville, MD 20852

NRC Resident Inspector U. S. Nuclear Regulatory Commission P. O. Box 289, Mail Code: MN116 Wadsworth, TX 77483

C. M. Canady City of Austin Electric Utility Department 721 Barton Springs Road Austin, TX 78704 (electronic copy)

A. H. Gutterman, Esquire Morgan, Lewis & Bockius LLP

Balwant K. Singal U. S. Nuclear Regulatory Commission

John Ragan Chris O'Hara Jim von Suskil NRG South Texas LP

Kevin Pollo Richard Pena City Public Service

Peter Nemeth Crain Caton & James, P.C.

C. Mele City of Austin

Richard A. Ratliff Texas Department of State Health Services

Alice Rogers Texas Department of State Health Services

NRC FOR (10-2010)	NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION APPROVED BY OMB: NO, 3150-0104 EXPIRES: 10/31/2013 Estimated burden per response to comply with this mandatory collection request: 80 hours - Reported lessons learned are incorporated into the							ollection						
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)									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 Section (T-5 F53). U.S. Nuclear Regulatory Commission, Washington. DC 20555-0001, or by internet e-mail to Infocollects.resource@nrc.gov , and to the Desk Officer, Office of Information and Regulatory Affairs. NEOB-10202. (3150-1104), 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. FACILI									CKET NUMI			3. PAGE		
Sou	uth Te	∍xas	Unit	1				, ا	0500049	ሷ ጿ		1 (OF 4	
4. TITLE			Ĺ	Jnit 1 Nu	ıclear Instrur	mentatic	on Chan	.1			el Check			
5. EVE	NT DATE	=		6. LER NU	JMBER		7. REPO	ORT DATE 8. OTHER FACILITIES INVOLVED						
MONTH	DAY	YEA	R	YEAR SEQUENTIAL REV NUMBER NO.			MONTH	DAY	YEAR	FACILITY NAMI	E		T NUMBE R	
03	27	201	12	2012	001	1	08	01	2012	N/A N/A		N/A N/A		
9. OPERA						•					Chack all tha			
	1			20.2201(d) 20.220		03(a)(3)(i) 03(a)(3)(ii) 03(a)(3)(ii) 03(a)(4)	50.73(a)(2)(i)(C) 50.73(a)(2)(i)(A) 50.73(a)(2)(ii)(A) 50.73(a)(2)(ii)(B))(2)(i)(C))(2)(ii)(A)	50.73(a)(2)(vii) 50.73(a)(2)(viii)(A) 50.73(a)(2)(viii)(B)				
10. POWE	R LEVE	:L			203(a)(2)(i)	_	(c)(1)(i)(A)	50.73(a)(2)(iii)			50.73(a)(2)(ix)(A)			
	100%	%			203(a)(2)(ii)	_	(c)(1)(ii)(A)				50.73(a)(2)(x)			
				_	203(a)(2)(iii)	50.36(50.73(a)(73.71(a)(4)			
				20.2203(a)(2)(iv) 50.46(a)(3)				50.73(a)(2)(v)(B)				☐ 73.71(a)(5)		
				20.2203(a)(2)(v) 50.73(a) 20.2203(a)(2)(vi) 50.73(a)			(a)(2)(i)(A) (a)(2)(i)(B)	_			☐ OTHER Specify in Abstract below			
						ICENSEE C		OR THIS			or in NR(C Form 366A		
FACILITY N							OHIAC.				TELEPHONE NU		ide Area Code)	
Joe Lo	ya, Lic			_	I INE FOR FACE	COMPONI	ENT FAILLI	DE DES	OBED IN		361-972-80	005		
CAUSE	SYSTE		COMPO		MANU-	REPORTABLE						REPORTABLE TO EPIX		
Х	FACTU			Thermo-	YES YES		+			FACTURER				
	<u> </u>	14	SUPP	PIEMENTAL	Fisher RESPONSE EXP	ECTED		+	15. EXPEC	TED	MONTH	DAY	YEAR	
T YES ((if yes, c				SUBMISSION DATE		Z NO		SUBMISSION DATE		WOTT	DA.	TEAN	
ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced ty pewritten lines) On March 27, 2012, Operations declared the Extended Range (E/R) Flux Lower Range Nuclear Instrument (NI-45A) inoperable based on failure to meet channel check acceptance criteria per the "Remote Shutdown Monitoring AND Accident Monitoring Instrumentation Channel Checks" Procedure. Subsequent troubleshooting discovered an issue with the channel's isolation circuit card, AT1. The AT1 card was found with a degraded condition which affected the output range of NI-45A. With this degraded condition, Extended Range (E/R) Flux Lower Range Nuclear Instrument (NI-45A) would not have been able to perform its design function. Subsequent review determined that NI 45A had been inoperable since February 29, 2012.														
After replacement of the AT1 card, the surveillance procedure was completed satisfactory on March 30, 2012 and the instrument was restored to operable. Since NI-45 had been inoperable for longer than the applicable Technical Specification 7 day Allowed Outage Time, this event is reportable under 10CFR50.73(a)(2)(i)(B), as an Operation or Condition Prohibited by Technical Specifications.														
There were no personnel injuries, no offsite radiological releases, and no damage to safety-related equipment associated with this condition. This condition did not have an adverse effect on the health and safety of the public.														
dependa prevent	able tes recurre	sting t ence i	to iden is to ini	ntify a failu itiate perio		eeding the Maintena	e Limiting ance activ	g Condit vities to	tion for O press te	peration (LCC est switches 1	D). The corr and 2 to tes	rective a	ck of timely and action identified to ow Range	

NRC FORM 366A	LICENSEE EVENT I CONTINUATIO	•	ER) U.S. NI	U.S. NUCLEAR REGULATORY COMMISSION			
1. FACILITY NAME	2. DOCKET	RNUMBER		3. PAGE			
Courth Toyon Unit 1	05000498	YEAR	SEQUENTIAL NUMBER	REV. NO	2 OF 4		
South Texas Unit 1	05000498	2012	001	01			

I. DESCRIPTION OF EVENT

A. REPORTABLE EVENT CLASSIFICATION

This event is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B), as any operation or condition that was prohibited by the plant's Technical Specifications.

- B. PLANT OPERATING CONDITIONS PRIOR TO EVENT South Texas Project (STP) Unit 1 was in Mode 1, with Reactor Power at approximately 100%.
- C. STATUS OF STRUCTURES, SYSTEMS, AND COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT No structures, systems, or components were inoperable at the start of the event that contributed to the event.

D. NARRATIVE SUMMARY OF THE EVENT

On March 27, 2012, Operations declared the Extended Range (E/R) Flux Lower Range Nuclear Instrument (NI-45A) inoperable based on the failure to meet Technical Specifications (TS) channel check acceptance criteria per the "Remote Shutdown Monitoring AND Accident Monitoring Instrumentation Channel Checks" Procedure. Subsequent troubleshooting discovered an issue with the channel's isolation circuit card, AT1. The AT1 card was found with a degraded condition which affected the indication of NI-45A Lower Range. With this degraded condition, Extended Range (E/R) Flux Lower Range Nuclear Instrument (NI-45A) would not have been able to perform its design function. After replacement of the AT1 card, the surveillance procedure was completed satisfactory on March 30, 2012 and the instrument was returned to an operable condition.

Each E/R channel has a Lower Range (which provides indication in shutdown conditions (counts per second)) and an Upper Range (which provides indication at power). For the time period under evaluation, Unit 1 was operating at power and the E/R Lower Range indication was saturated and considered unreliable. The E/R Lower Range indication is considered unreliable above approximately 1E-4% Power (100,000 CPS). At 100,000 CPS, saturation occurs in the Extended Range Lower Range Nuclear Instrumentation circuitry and a channel may indicate less than 100,000 CPS.

A review of channel data indicated that starting in December 2011; the NI-45 E/R Lower Range indication began a downward trend. Subsequent Channel Checks performed in January and February (monthly surveillance) were completed satisfactorily. These Channel Checks are performed with an acceptance criterion that notes the Lower Range indications may be unreliable, and that other indications such as E/R Upper Range output may be used to determine problems with the detector. During this time period, there were no issues found with the detectors E/R Upper Range output indication.

As stated previously, a degraded condition (downward trend) involving the E/R Lower Range indication had been evident since December 2011. Even though this indication is considered unreliable, there is reasonable confidence that in this instance, the indication showed the degrading performance of the AT1 card. Based on how the Surveillance procedure is performed, the Channel Check between NI-45A and NI-46A would have failed to meet the "factor of 10" acceptance criteria on February 29, 2012, (NI-045A = 10,527 cps, NI-046A = 106,057 cps). Therefore, it was concluded that the E/R Lower Range indication was inoperable from February 29, 2012 until the

NRC FORM 366A LICENSEE EVENT REPORT (LER) U.S. NUCLEAR REGULATORY COMMI CONTINUATION SHEET						
1. FACILITY NAME	2. DOCKET	6. LEF	NUMBER		3. PAGE	
South Texas Unit 1	05000498	YEAR	SEQUENTIAL NUMBER	REV. NO	3 OF 4	
South rexas Onit 1	00000496	2012	001	01		

channel was restored to operable on March 30, 2012.

The TS 3.3.3.6 Allowed Outage Time for an inoperable Extended Range nuclear instrumentation channel is 7 days. Because Extended Range channel NI-45 was inoperable longer than the TS allowed outage time and associated shutdown time, this event is considered REPORTABLE under 10CFR50.73(a)(2)(i)(B), Operations or Conditions Prohibited by Technical Specifications.

E. METHOD OF DISCOVERY

This event was discovered by Operations during the performance of the "Remote Shutdown Monitoring AND Accident Monitoring Instrumentation Channel Checks" surveillance procedure.

II. EVENT-DRIVEN INFORMATION

A. SAFETY SYSTEMS THAT RESPONDED N/A

B. DURATION OF SAFETY SYSTEM INOPERABILITY

As discussed above, the Extended Range (E/R) Flux Lower Range Nuclear Instrument (NI-45A) was inoperable from February 29, 2012 until March 30, 2012 (approximately 31 days).

C. SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT

Nuclear or radiological safety was not affected. This event had no impact to the safety of the public or station personnel. This event did not impact the reliability of plant operation or production capacity. There was no impact to the Core Damage Frequency or Large Early Release Frequency associated with this event.

III. CAUSE OF THE EVENT

A. The root cause of this event was the lack of timely and dependable testing to identify a failure prior to exceeding the Limiting Condition for Operation (LCO).

This investigation identified that the monthly channel check test method provided in the Remote Shutdown Monitoring and Accident Monitoring Instrumentation Channel Checks procedure, 0PSP03-SP-0001, is not a reliable method to determine operability of the low range channels due to their unreliable indication when at power. With the required monthly frequency, exceeding the 7 day LCO is possible. A more reliable method would be by using the presently designed built in test pushbuttons. Performing a periodic test to use pushbuttons S1 and S2 to test Integrated Computer System (ICS) point NI0045A would have identified the fault with the degrading AT1 much earlier and would have prevented this event from being reportable.

IV. CORRECTIVE ACTIONS

A. Initiate periodic preventive maintenance activities to press test switches 1 and 2 to test E/R Low Range indication twice weekly and verify startup rate indication on ICS.

NRC FORM 366A LICENSEE EVENT REPORT (LER) U.S. NUCLEAR REGULATORY COMMISSION CONTINUATION SHEET							
1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE		
Courth Toyon I Init 1	05000498	YEAR	SEQUENTIAL NUMBER	REV. NO	4 OF 4		
South Texas Unit 1	03000498	2012	001	01			

V. PREVIOUS SIMILAR EVENTS

There have been no similar reportable events at STP within the last three years.

VI. ADDITIONAL INFORMATION

N/A