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November 30, 2012 GO2-12-172

10 CFR 50.73

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

Subject:

COLUMBIA GENERATING STATION, DOCKET NO. 50-397

LICENSEE EVENT REPORT NO. 2012-004-01

Dear Sir or Madam:

Transmitted herewith is Supplemental Licensee Event Report No. 2012-004-01 for Columbia Generating Station. This report is submitted pursuant to 10 CFR 50.73(a)(2)(i)(B). The enclosed report discusses items of reportability concerning a condition prohibited by Technical Specifications that occurred when performing work on a breaker that supplied a critical bus from one of Columbia's credited offsite power sources. This discrepant condition was discovered on August 22, 2012.

There are no commitments being made to the NRC herein. If you have any questions or require additional information, please contact Mr. Z.K. Dunham at (509) 377-4735.

Respectfully.

W.G. Hettel

Vice President, Operations

Enclosure:

Licensee Event Report 2012-004-01

cc: NRC Region IV Administrator

NRC NRR Project Manager

NRC Senior Resident Inspector/988C

A.J. Rapacz - BPA/1399

W.A. Horin - Winston & Strawn

IFRR

NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION						APPROVED BY OMB NO. 3150-0104 EXPIRES 10/31/2013									
(10-2010) LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)						80 fee Se 00 Of Mi inf NF	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 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 (3150-0104), 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.								
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Failure to meet Technical Specifications completion time for offsite power															
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14. SUPPLEMENTAL REPORT EXPECTED 15. EXPECTED MONTH DAY YEAR															
☐ YES (If yes, complete 15. EXPECTED SUBMISSION DATE) ☐ NO DATE															
ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)															
On August 22, 2012, it was discovered that during maintenance on breaker E-CB-S/1, required Technical															

On August 22, 2012, it was discovered that during maintenance on breaker E-CB-S/1, required Technical Specification (TS) 3.8.1 Condition A was not entered. The breaker provides power to an essential bus from one of the credited offsite power sources. While E-CB-S/1 was out of service, Columbia Generating Station (Columbia) would not have been able to meet acceptance criteria in a surveillance procedure used to satisfy Surveillance Requirement (SR) 3.8.1.1. Therefore, per SR 3.0.1, failure to meet the surveillance requirement indicates that Limiting Condition for Operation (LCO) 3.8.1 was not met. The breaker was inoperable for approximately 30 hours, resulting in the failure to meet the Required Actions described in Condition A and F within the specified Completion Times. The apparent cause was determined to be a failure to follow station processes and procedures for determining operability. Contributing causes included conflicting information between the associated TS Bases and operations procedures that fulfill the requirements of TS SR 3.8.1.1

NRC FORM 366A (10-2010) **U.S. NUCLEAR REGULATORY COMMISSION**

LICENSEE EVENT REPORT (LER) CONTINUATION SHEET

1. FACILITY NAME	2. DOCKET		6. LER NUMBER	3. PAGE		
Columbia Generating Station	05000397	YEAR SEQUENTIAL REV NUMBER NO.			2 OF 3	
Columbia Generaling Station	03000397		2012 - 04 - 01	2013		

NARRATIVE

Plant Condition

Columbia Generating Station (Columbia) was operating in Mode 1 at 100% power. There were no structures, systems, or components that were inoperable at the start of this event and that contributed to this event.

Description of Event

On August 22, 2012, it was discovered that during maintenance on breaker E-CB-S/1 [BKR], required Technical Specification (TS) Action Statement (TSAS) 3.8.1 Condition A was not entered. The breaker provides power to the Division 1 critical electrical bus E-SM-7 [BU] from the credited offsite source, E-TR-S [XFMR]. It was discovered that while E-CB-S/1 was out of service, Columbia would not have been able to satisfy acceptance criteria in the associated surveillance procedure used to satisfy Surveillance Requirement (SR) 3.8.1.1. Therefore, per SR 3.0.1, failure to meet the surveillance requirement indicates that Limiting Condition for Operation (LCO) 3.8.1 was not met. The breaker was inoperable for approximately 30 hours, resulting in the failure to meet the Required Actions described in TS 3.8.1 Condition A and F, within the specified Completion Times.

Immediate Corrective Actions

Night orders were initiated notifying operations personnel of the issue and the appropriate measures to take going forward when planning work with the associated breakers. Specifically, any work which impacts the ability of E-TR-S to supply power to the critical electrical bus for Division 1 or Division 2 will require entry into TS 3.8.1 Condition A.

Causes

The apparent cause was determined to be a failure to follow the process for operability determination as stated in plant procedures, which require ensuring equipment can meet its SR. Contributing causes included conflicting information between the associated TS Bases and procedure that fulfills the requirements of TS SR 3.8.1.1

Further Corrective Actions

The following corrective actions are planned or have been completed:

- Develop methodology to be used by operations when making operability determinations for equipment removed from service.
- Enhance procedures concerning operability determinations for equipment removed from service.
- Initiate training requests to train operators on methodology to be used when making operability determinations for equipment removed from service.
- Revise associated operations procedures based on TS Bases requirements.
- Develop a formal position for offsite power requirements.
- Conduct a focused self-assessment to ensure the adequacy of TS Bases and implementation of TS SRs.

NRC FORM 366A

(10-2010)

U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER) CONTINUATION SHEET

1. FACILITY NAME	2. DOCKET	I	6. LER NUMBER	3. PAGE		
Columbia Generating Station	05000397	YEAR	SEQUENTIAL NUMBER	3 OF 3		
Columbia Generaling Station	05000597		2012 - 04 - 01		3 OF 3	

NARRATIVE

Assessment of Safety Consequences

There were no actual safety consequences as a result of this condition. Critical electrical buses E-SM-7 and E-SM-8 [BU] are normally energized from Normal Auxiliary transformer, E-TR-N1 [XFMR], when the main generator [GEN] is operating.

Similar Events

A search was performed for each time E-CB-S/1 was taken out of service in the past three years. The associated work orders (WO) and control room logs were reviewed to determine whether the duration the breaker was out of service exceeded the Completion Times of TS 3.8.1 Conditions A and F. On two occasions separate from the event being reported in this LER, E-CB-S/1 was taken out of service and the TS allowed outage time was exceeded. These two other events occurred on 11/22/2010 and 8/31/2011. A similar search was performed on E-CB-S/3 as it performs the same function as E-CB-S/1, but on Division 2. On 3/28/2011 E-CB-S/3 was taken out of service and the TS allowed outage time was exceeded.

Energy Industry Identification System (EIIS) Information

EIIS information is denoted as [XX], [XXX], or [XXXX] throughout the narrative.