



Florida Power & Light Company, 6501 South Ocean Drive, Jensen Beach, FL 34957

November 29, 2001

L-2001-255
10 CFR § 50.73

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Re: St. Lucie Unit 1
Docket No. 50-335
Reportable Event: 2001-009-00
Date of Event: September 4, 2001
Inoperable Accident Monitoring Instrument
Led to Operation Prohibited by TS

The attached Licensee Event Report 2001-009 is being submitted pursuant to the requirements of 10 CFR § 50.73 to provide notification of the subject event.

NRC Regulatory Issue Summary 2001-05 waived the requirements that multiple copies of documents be submitted to the NRC. Therefore, hard copies usually sent to the Regional Administrator and Senior Resident Inspector will not be sent.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Donald E. Jernigan', written over the closing text.

Donald E. Jernigan
Vice President
St. Lucie Nuclear Plant

DEJ/KWF

Attachment

IE 22

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If 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.

FACILITY NAME (1) St. Lucie Unit 1	DOCKET NUMBER (2) 05000335	PAGE (3) Page 1 of 3
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TITLE (4)
Inoperable Accident Monitoring Instrument Led to Operation Prohibited by TS

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	DOCKET NUMBER
09	04	2001	2001	009	00	11	29	2001		
									FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more) (11)									
POWER LEVEL (10) 100	20.2201(b)		20.2203(a)(3)(ii)		50.73(a)(2)(ii)(B)		50.73(a)(2)(ix)(A)			
	20.2201(d)		20.2203(a)(4)		50.73(a)(2)(iii)		50.73(a)(2)(x)			
	20.2203(a)(1)		50.36(c)(1)(i)(A)		50.73(a)(2)(iv)(A)		73.71(a)(4)			
	20.2203(a)(2)(i)		50.36(c)(1)(ii)(A)		50.73(a)(2)(v)(A)		73.71(a)(5)			
	20.2203(a)(2)(ii)		50.36(c)(2)		50.73(a)(2)(v)(B)		OTHER			
	20.2203(a)(2)(iii)		50.46(a)(3)(ii)		50.73(a)(2)(v)(C)		Specify in Abstract below or in NRC Form 366A			
	20.2203(a)(2)(iv)		50.73(a)(2)(i)(A)		50.73(a)(2)(v)(D)					
	20.2203(a)(2)(v)		X 50.73(a)(2)(i)(B)		50.73(a)(2)(vii)					
	20.2203(a)(2)(vi)		50.73(a)(2)(i)(C)		50.73(a)(2)(viii)(A)					
20.2203(a)(3)(i)		50.73(a)(2)(ii)(A)		50.73(a)(2)(viii)(B)						

LICENSEE CONTACT FOR THIS LER (12)									
NAME Kenneth W. Frehafer, Licensing Engineer					TELEPHONE NUMBER (Include Area Code) (561) 467 - 7748				

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)									
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX
D	IP	RJX	L045	N/A	-	-	-	-	-

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)		
YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO		MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On September 4, 2001, St. Lucie Unit 1 was in Mode 1 operation at 100 percent reactor power. LI-1103, the pressurizer cold calibrated level instrument, was taken out of service on October 12, 2001 to replace a power supply. At the time, LI-1103 was credited as a post accident monitoring instrument. Based on a review of LI-1103's instrument history, on October 13, 2001 St. Lucie determined that the instrument should have been declared out of service during the surveillance performed on September 4, 2001.

The cause of this event, failing to declare LI-1103 out of service due to increasing degradation, was personnel error, with inadequate surveillance procedure requirements contributing to the event. However, prior to this event FPL recognized that pressurizer level instrument LI-1103 was never intended to be qualified as post accident monitoring instrumentation, and submitted a change to the Technical Specifications to correct this error. The NRC subsequently approved the license amendment on October 18, 2001. Therefore, this event had no impact on the health and safety of the public.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
St. Lucie Unit 1	05000335	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	Page 2 of 3
		2001	- 009	- 00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Description of the Event

On September 4, 2001, St. Lucie Unit 1 was in Mode 1 operation at 100 percent reactor power. LI-1103, the pressurizer cold calibrated level instrument [EIIS:IP:LI], was taken out of service on October 12, 2001 to replace a power supply [EIIS:IP:RUX]. On October 13, 2001, Operations initiated a condition report to evaluate if action statement 1 of Table 3.3-11 of Technical Specification 3.3.3.8, "Accident Monitoring Instrumentation," should have been entered earlier due to increasing degradation of LI-1103. Based on a review of LI-1103's instrument history, St. Lucie determined that the instrument should have been declared out of service during the surveillance performed on September 4, 2001.

Cause of the Event

The degradation of LI-1103 was due to a failing power supply. The cause of this event, failing to declare LI-1103 out of service due to increasing degradation, was personnel error with inadequate surveillance procedure requirements contributing to the event. The Conduct of Operations procedure (0010120) and OP-1-0010125A, Surveillance Data Sheets, provide guidance on declaring instruments inoperable when readings taken during channel checks cannot establish proper operation of the instrument.

St. Lucie Unit 1 Technical Specification (TS) Table 3.3-11 states that the total number of channels of pressurizer water level is three and the minimum number of channels required to be operable is one. In order to ensure compliance with this TS, the pressurizer level instruments are channel checked monthly. However, the criteria for performing an adequate channel check for LI-1103 were unclear; no guidance was given for the use of another similar instrument to channel check nor was there an established quantitative measure of acceptable operation.

Analysis of the Event

This event is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B) as operation of the facility in a manner prohibited by TS. The amount of time operation with LI-1103 in a failed condition exceeded the 30 day allowed outage time (AOT) permitted by TS Table 3.3-11, Action 1.

Analysis of Safety Significance

Accident monitoring instrumentation should meet Regulatory Guide 1.97 environmental qualification and qualify requirements to assure that these instruments are operable post accident. NUREG-1432, Standard Technical Specifications (STS) for CE Plants, only requires two total channels of pressurizer level instrumentation. Unlike the STS, the TS for St. Lucie Unit 1 required three total channels of pressurizer level instrumentation. Pressurizer level instruments LI-1110X and LI-1110Y are environmentally qualified and are credited to satisfy Regulatory Guide 1.97 instrumentation requirements. The third channel, LI-1103, is not environmentally qualified, is not powered by Class 1E power and is not credited to satisfy regulatory Guide 1.97 requirements. Based on the above, FPL submitted a change to the TS to align the pressurizer level instrumentation requirements with NUREG-1432. This change was included in the license amendment submitted on April 18, 2001 by FPL letter L-2001-078. The NRC approved this change in St. Lucie Unit 1 TS amendment 177 on October 18, 2001.

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St. Lucie Unit 1	05000335	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	Page 3 of 3
		2001	- 009	- 00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Pressurizer level instrument LI-1103 was never intended to be qualified as post accident monitoring instrumentation. This TS error was corrected by a license amendment that was subsequently approved by the NRC. During this event qualified instruments provided accident monitoring instrumentation for pressurizer level. Therefore, this event had no impact on the health and safety of the public.

Corrective Actions

1. The erroneous TS requirements for LI-1103 were removed by approval of St. Lucie Unit 1 TS amendment number 177.
2. The faulty power supply replacement was completed under work order 31016388 on October 23, 2001.
3. Operations personnel involved in this event have been held accountable.
4. The issue was discussed during Operator Requalification Training to demonstrate error prevention.
5. Procedure enhancements for OP-1-0010125A are planned to: a) improve Data Sheet 26 with references to ensure that degraded instruments identified during the performance of DS-26 are processed properly, and b) expected parameters to applicable portions of DS-26 will be added.

Additional Information

FPL recognized and submitted the proposed license amendment to correct the TS requirements for LI-1103 well before the event date of September 4, 2001. However, the discovery date and reportability "clock" for this event occurred on October 13, 2001. Even though the TS amendment was approved on October 18, 2001, 10 CFR 50.73 and Revision 1 to NUREG 1022 requires reporting of events where the operation or condition was prohibited at the time of discovery of the event.

Failed Components Identified

Component: Power Supply
 Manufacturer: Lamda
 Model No.: LCS-B-24

Similar Events

None