

Crystal River Nuclear Plant Docket No. 50-302 Operating License No. DPR-72

Ref.: 10 CFR 50.73

August 14, 2002 3F0802-01

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

Subject: LICENSEE EVENT REPORT 50-302/02-001-00

Dear Sir:

Please find enclosed Licensee Event Report (LER) 50-302/02-001-00. The LER discusses Emergency Diesel Generator EGDG-1A automatically starting and powering the "A" 4160 Volt Engineered Safeguards Bus following a loss of the Off-Site Power Transformer on June 17, 2002, and July 20, 2002. This report is being submitted pursuant to 10CFR50.73(a)(2)(iv)(A).

If you have any questions regarding this submittal, please contact Mr. Sid Powell, Supervisor, Licensing & Regulatory Programs at (352) 563-4883.

Sincerely

Jon A. Franke Plant General Manager

JAF/dwh

Enclosure

xc: NRR Project Manager Regional Administrator, Region II Senior Resident Inspector



NRC FORM 366 U.S. NUCLEAR REGULATORY				APPROVED BY OMB NO. 3150-0104 EXPIRES 7-31-2004 Estimated burden per response to comply with this mandatory information collection											
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)				request 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry Send comments regarding burden estimate to the Records Management Branch (T-6 E6), US Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bis1@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 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						·	2. DO	CKET NUM	ЛВЕ	R		3. F	AGE		
	С	RYSTAL	RIVE	R UNIT 3				05	500	0 30	2	K		1 OF	12
4. TITLE Autom	atic Sta	rt Of An E	Emer	gency Diesel	Ger	nerato	or Du	e To Lo	SS	Of Th	ne Offsite Po	we	r Trar	nsforme	er
5.	EVENT D	ATE		6. LER NUMBER		7. 1	REPOR	TDATE			8. OTHER	FACI	LITIES II	WOLVED	
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06	17	2002	02	- 001 -	00	08	14	2002	F		NAME	DOC	0500	JMBER)	
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мо	DE	1		20 2201(b)		20 220)3(a)(3)(ii)	1	50.73	3(a)(2)(ii)(B)	\square	50.73(8	a)(2)(ix)(A))
10. PC	OWER	1000/		20 2201(d)		20 220)3(a)(4)	+	50.73	3(a)(2)(III)	$\left - \right $	50.73(8	<u>a)(2)(x)</u>	
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1 213 4 14	· · · · ·			<u>20.2203(a)(3)(1)</u> 12.		ENSEE	CONT	ACT FOR	TH	SLER		<u> </u>			
NAME									TT	ELEPHO	NE NUMBER (Incl	ude A	rea Cod	e)	
		Dennis ^v	W. He	errin. Lead En	aine	eer					(352) 795-64	486	, Exte	nsion 3	299
		13. C	OMPLE	ETE ONE LINE FO	RE	ACH CC	OMPON	NENT FAI	LUF	E DES	CRIBED IN THIS	S RE	PORT		
		1													
CAUSE	SYSTEM	COMPONEN	π	MANUFACTURER	RE	PORTABL	E .	CAUSE	S	STEM	COMPONENT	N	ANU-FA	CTURER	TO EPIX
В	FR	CBI5		K080	1	Y	^ي و د								
		14 SUPPL	EMENT		ECT	ED				15. E	XPECTED	Тм	ONTH	DAY	YEAR
		complete E	VDECT		ΠΔΤ	(F)	X	NO		SUB	BMISSION DATE				
16. ABS	TRACT (I	Limit to 1400	spaces	s, i.e., approximate	ely 15	5 single-	spaced	d typewritt	en l	ines)					<u> </u>
Or	1 June 1	7, 2002.	Florid	da Power Cor	pora	ation's	s (FP	'C's) Cr	γst	al Riv	er Unit 3 (C	R-3) was	in MOI	DE 1
(P	OWER	OPERAT	ION)	at 100 perce	nt F	ATE	D TH	ERŃAL	.Ρ	OWE	R (RTP). Ar	n ele	ectric	al storn	n was
in i	progres	s. At 10:	48. Ć	R-3 experien	ced	a los	s of "	'A" Trai	n c	ffsite	power due t	o lo	ss of	the Off	site
Po	wer Tra	insforme	r (OP	T). The caus	e fc	or loss	of th	e OPT	Wa	is a sl	hort during a	a lig	htnin	g storm	that
res	sulted in	n relav ac	tuatic	on. During the	e lig	htning	g stor	m, the	gro	ound p	potential was	s ra	ised t	o a poi	nt
wh	ere pre	-existina	dama	age allowed a	sho	ort to i	the g	round c	on	ducto	r. Repairs v	vere	e mac	le and t	:he
OF	PT was	returned	to se	rvice. On July	y 20), 200	2, FF	PC's CF	}-3	was i	n MODE 1 a	at 10)0 pe	rcent R	TP.
No	electri	cal storm	was	in progress.	At 1	6:45.	CR-3	3 exper	ien	ced a	loss of "A"	Trai	n offs	site pow	/er
du	e to los	s of the C	OPT.	The cause fo	or lo	ss of i	the C	PT wa	s la	atent c	lamage to th	ne o	able	insulati	on
fro	m the li	ahtnina s	trike	that caused lo	oss	of the	OP	Г on Ju	ne	17, 20	002. Repair	's w	ere n	nade an	d the
OF	PT was	returned	to se	rvice. In both	eve	ents, l	Emer	gency	Die	sel G	enerator EG	DG	i-1A a	utomat	lically
sta	arted an	d re-ene	rgized	d 4160v Engir	neer	red Sa	afegu	ards (E	:S)	Bus "	A." Automa	tic a	actua	tion of	
E E	GDG-1A	is report	able	under 10CFR	50.	73(a)((2)(iv))(A). Ť	his	condi	ition does no	ot re	pres	ent a	
red	duction	in the pu	blic h	ealth and safe	ety.	Corr	ective	e action	ıs i	nclude	e an evaluat	ion	of ca	ble	

replacement. No previous similar occurrences have been reported to the NRC.

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NRC FORM 366A			U.S. NUCLEAF	REGULATOR					
	IT REPORT (l	.ER)							
1. FACILITY NAME	2. DOCKET		6. LER NUME	ER	3. PAGE				
CRYSTAL RIVER UNIT 3	05000302	YEAR	SEQUENTIAL	REVISION NUMBER	2 OF 12				
		02	- 001 -	00					
17. TEXT (If more space is required, use additional copies of NRC Form 366	ŝA)								
EVENT DESCRIPTION									
On June 17, 2002, Florida Power Corporation's (FPC's) Crystal River Unit 3 (CR-3) was in MODE 1 (POWER OPERATION) at 100 percent RATED THERMAL POWER (RTP). An electrical storm was in progress in the area. At 10:48, CR-3 experienced a loss of "A" Train offsite power due to loss of Offsite Power Transformer (OPT) MTTR-9 [EB, XFMR]. Emergency Diesel Generator EGDG-1A [EK, DG] automatically started and re-energized 4160 volt (4160V) Engineered Safeguards (ES) Bus "A" [EB, BU]. At 21:05, on June 17, 2002, 4160V ES Bus "A" was aligned to the Backup ES Transformer (BEST) [EB, XFMR] power feed and EGDG-1A was restored to ES standby.									
There were no structures, systems or component that contributed to the event. No failure of equipr noted. CR-3 remained stable and on-line at 100	is that were ino ment that shoul percent RTP th	perabl d have rough	e at the sta automatica out the ever	rt of the ev ally actuat nt.	vent ed was				
Improved Technical Specification (ITS) 3.8.1, Condition A, was entered due to loss of the OPT. ITS 3.8.1, Required Action A.3, states that the required offsite circuit must be restored to an operable status within 72 hours. At 23:45, on June 19, 2002, the OPT power feed to 4160V ES Bus "A" was restored to an operable status and ITS 3.8.1, Condition A, was no longer applicable.									
On July 20, 2002, FPC's CR-3 was in MODE 1 (F electrical storm was in progress in the area. At 1 power due to loss of OPT MTTR-9. EGDG-1A at Bus "A." At 21:32, on July 20, 2002, 4160V ES E EGDG-1A was restored to ES standby.	On July 20, 2002, FPC's CR-3 was in MODE 1 (POWER OPERATION) at 100 percent RTP. No electrical storm was in progress in the area. At 16:45, CR-3 experienced a loss of "A" Train offsite power due to loss of OPT MTTR-9. EGDG-1A automatically started and re-energized 4160V ES Bus "A." At 21:32, on July 20, 2002, 4160V ES Bus "A" was aligned to the BEST power feed and EGDG-1A was restored to ES standby.								
There were no structures, systems or component that contributed to the event. No failure of equipr noted. CR-3 remained stable and on-line at 100	ts that were ino ment that shoul percent RTP th	perabl d have irough	e at the sta automatica out the even	rt of the e [.] ally actuat nt.	vent ed was				
ITS 3.8.1, Condition A, was entered due to loss of that the required offsite circuit must be restored to July 23, 2002, the OPT power feed to 4160V ES ITS 3.8.1, Condition A, was no longer applicable.	of the OPT. ITS o an operable s Bus "A" was re	3 3.8.1 status stored	, Required a within 72 ho to an opera	Action A.3 ours. At 1 able status	, states 1:28, on s and				
Valid starting of an EGDG is reportable to the NF eight-hour notification was made to the NRC Ope accordance with 10CFR50.72(b)(3)(iv)(A). At 22 notification was made to the NRC Operations Ce 10CFR50.72(b)(3)(iv)(A). This report is being su	C. At 14:16, o rations Center :15, on July 20, nter (Event Nu bmitted pursua	n June (Even 2002, mber 3 nt to 1	e 17, 2002, t Number 3 a non-eme 99079) in ac 0CFR50.73	a non-emo 8996) in ergency eig cordance (a)(2)(iv)(/	ergency ght-hour with A).				

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U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	1	6. LER NUMB	ER	3. PAGE
CRYSTAL RIVER UNIT 3	05000302	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 12
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17. TEXT (If more space is required, use additional copies of NRC Form 366A)

SAFETY CONSEQUENCES

General

The OPT is located in the 230 kilovolt (230KV) switchyard [EB] and supplies the normal source of power to 4160V ES Bus "A." The BEST is located on the berm inside the Protected Area and is the normal source of power to 4160V ES Bus "B." The OPT, along with the BEST, provides two full capacity, redundant, dedicated offsite power feeds to the 4160V ES buses.

The feed from the OPT to the 4160V ES switchgear is a cable run (approximately 1179 feet) in a duct bank from the 230KV switchyard to the termination building (MT-14) on the CR-3 berm. The duct bank is underground for a large portion of the route, exposing the cables to water immersion periodically prior to the June 17, 2002, event. Six three-conductor cables (Kerite, 750 MCM) run from the OPT, through three underground cable vaults (two vaults contain cable splices), two aboveground cable vaults (both contain cable splices), to a termination house (see Drawing #1 – Page 9/12). The cable run continues from the termination house to 4160V ES Bus "A."

The other offsite power supply (BEST) is fed from the 230KV switchyard via overhead lines. These lines are not subject to water submergence.

EGDG-1A is the emergency power supply for 4160V ES Bus "A." EGDG-1B is the emergency power supply for 4160V ES Bus "B."

FPC concludes that the loss of the OPT did not represent a reduction in the public health and safety. The BEST remained operable at all times and EGDG-1A started and loaded as designed. Since the BEST remained fully operable, this event does not meet the definition of a Safety System Functional Failure.

Supplemental: Operability Between June 17, 2002, and July 20, 2002

The failure on June 17, 2002, was caused by a lightning induced voltage surge resulting in a short to ground of one 'B' phase conductor. The short occurred at a location where the three-conductor cable jacket had been stripped to splice the conductors. The damaged conductor insulation was repaired. When the OPT cabling was returned to service, several conductors were accepted for use following review of vendor test data.

The failure on July 20, 2002, is attributed to a weakness in the insulation of another 'B' phase conductor that may have been degraded by the previous lightning event. No operating or transient conditions have been identified that were coincident with this failure.

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	NRC FORM 366A		U.S. NUCLEAR REGULATORY COMMISSION
5		IT REPORT (I	LER)
	1. FACILITY NAME	2. DOCKET	6. LER NUMBER 3. PAGE
	CRYSTAL RIVER UNIT 3	05000302	YEAR SEQUENTIAL REVISION NUMBER NUMBER 4 OF 12
			02 - 001 - 00
	17. TEXT (If more space is required, use additional copies of NRC Form 360	is the as-left co	onfiguration of the cables in the
	A contributing factor under consideration vicinity of the splices from the June repair bundled together and covered with a zipp compressed the uninsulated grounds into conductors, potentially further compromis a filler material maintains a separation of conductors and the grounds. Additionally zippered jackets that had been removed a of the cable filler material after the repairs CR-3 Engineering has evaluated the norm OPT cables. Insulation failure is primarily These cables are relatively lightly loaded to their current carrying capability (1135 a capability). The post-accident operating o insulation that is not observed during norr remained operable during June and July of A risk analysis was performed conservation	s the as-left oc s, where the co ered jacket. The the outer surfa- ing the insulati- approximately , during the Jul and replaced in the were made in the and post-ac related to volta- even under the conditions would mal operation. until the insulati- vely assuming	onductors and the cable grounds are his configuration actually ace of the insulation of the ion. In the unspliced cable sections, 14-inch between the insulated by repair, water was found within the n June. The water had leached out a June. ccident operating conditions for the tage potential across the insulation. e most demanding conditions relative both ES buses versus 1872 amps Id not place additional stress on the Therefore, the cables and the OPT tion failure on July 20, 2002. a degraded cable condition during
	the period between the June 17, 2002, ev July 17, 2002, event. This period of time with a degraded cable and (2) a 3 day wir Probabilistic Risk Assessment, the total In to be well below 1.0E-06, indicating low ri	includes two conduction includes two condow with the Condow with the Conduction incremental Conduction sk significance	onfigurations: (1) the 30 day window OPT out of service. Using the CR-3 re Damage Probability is estimated
	CAUSE		
	June 17, 2002		
	The cause for loss of the OPT was a light ground of one 'B' phase conductor. The conductor cable jacket had been stripped when the splice was originally made. The zippered jacket to the cable outer jacket. was raised to a point where this pre-exist conductor. This caused a current imbala that actuated the Transformer #9 Neutral 4900, 4902 and 3211 [EB, BKR]. This sh relay actuation is identified as the event of	tning induced v short occurred to splice the c e damage was During the ligh ing damage all nce in the curre Differential Re nort during the l cause.	voltage surge resulting in a short to at a location where the three- conductors on Cable #1, Phase B, located near the transition of the htning storm, the ground potential lowed a short to the ground ent transformer [EB, XCT] circuit elay [EB, 87] and opened breakers lightning storm that resulted in the

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U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

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

Water was found in the cable vault in the CR-1/CR-2 parking lot where the damaged cable was located. When the cable vault was opened, the water level was below the level of the damaged cable. However, FPC cannot determine if the level was higher during or prior to the event. The accumulation of water in the cable vault is identified as a potential contributing factor.

On June 18, 2002, the cables in the field were meggered. The following values in megohms were recorded.

Cable	Phase A to	Phase A to	Phase B to	Phase A to	Phase B to	Phase C to
	Phase B	Phase C	Phase C	Ground	Ground	Ground
1	5.44	6.7	4.0	6.8	0.48	3.0
2	25.0	31.8	25.1	17.5	8.0	18.4
3	7.5	8.1	13.1	2.0	7.3	7.0
4	30.1	33.5	26.4	20.2	10.4	13.8
5	20.1	20.5	19.5	11.5	8.5	9.6
6	8.8	16.6	18.5	3.24	5.0	15.01

July 20, 2002

The cause for loss of the OPT was latent damage from the lightning strike that caused loss of the OPT on June 17, 2002. Upon investigation, Phase B of Cable #4 conductor was found shorted to ground in the CR-1/CR-2 parking lot cable vault. When the Cable #4 splice zippered jacket was opened, approximately 0.5 gallons of water was drained.

During the June event, this cable had an as-found phase-to-ground insulation resistance of 10.4 megohms. After inspection and replacing the zippered jacket, the return to service phase-to-ground insulation resistance was 1.37 megohms. The change in resistance value could have been due to changing the configuration of the ground wire and individual conductors during the installation of the zippered jacket. It could have also been due to pressing the ground wire into the conductor insulation during the installation of the zippered jacket. Changing the configuration of the cable in the zippered jacket could have moved the ground wire closer to a portion of the insulation material degraded by the June lighting strike. The collected water inside the zippered jacket then created a path for tracking through the degraded insulation to the ground wire.

On July 21, 2002, the cables in the field were meggered. The following values in megohms were recorded.

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U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

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

Cable	Phase A to	Phase B to	Phase C to		
	Ground	Ground	Ground		
1	6.0	17.0	3.0		
2	14.0	6.0	14.0		
3	4.0	5.0	5.0		
4	12.0	·0.0	12.0		
5	8.0	7.0	9.0		
6	5.0	5.0	15.0		

CORRECTIVE ACTIONS

June 17, 2002

1. After the initial readings were recorded, the cables were cleaned at the termination building and examined for areas where the cable insulation was damaged due to a lightning strike. Nine of the conductors were found to exhibit damage to the insulation. These conductors were repaired using Raychem 5KV rated NMCK8-2L insulation kits.

A cable fault test was performed to determine the location of any additional faults in the cables. This test determined that Phase B of Cable #1 was damaged north of the cable bridge. Further investigation determined the cable was damaged at an area adjacent to a splice in the cable vault. This cable vault is located in the CR-1/CR-2 parking lot and was found to contain water. The cable vault was drained of water. The cable was dried and repaired using insulation material rated for the required 5KV application. The cable fault test was performed again and no additional defects were discovered.

The other cable vaults were opened and inspected for water intrusion. Cable vaults containing water were pumped and the cables were inspected for water intrusion.

After the cables were repaired, the cables were meggered for phase to ground resistance. The following values in megohms were recorded (values for the previous readings are in parenthesis).

Cable	Phase A to Ground	Phase B to Ground	Phase C to Ground
1	4.3 (6.8)	36 (0.48)	2.6 (3.0)
2	22 (17.5)	9.7 (8.0)	2.3 (18.4)
3	1.55 (2.0)	7.9 (7.3)	6.5 (7.0)
4	13.8 (20.2)	1.37 (10.4)	13.1 (13.8)
5	14.3 (11.5)	11.7 (8.5)	9.22 (9.6)
6	8.8 (3.24)	16.6 (5.0)	18.5 (15.01)

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LICENSEE EVENT REPORT (LER)

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

In some cases, the resistance values recorded in the second test are lower than those recorded in previous tests. FPC Engineering personnel expected that once the cables were energized, any remaining moisture would be expelled from the cable insulation whereby the insulation should exhibit higher resistance values.

- 2. Nuclear Condition Report (NCR) 63221 was initiated to evaluate the long-term resolution of water in the cable vaults.
- 3. NCR 62928 will track evaluations of: (1) the adequacy of switchyard lightning protection; (2) the addition of lightning protection for the termination building; (3) the adequacy of the switchyard grounding design; and, (4) the water submergence question for medium voltage cables.

July 20, 2002

1. The zippered jackets were removed from the cable splices in both the CR-1/CR-2 parking lot cable vault and the cable vault located near the CR-1/CR-2 gate for this cable run. The exposed conductor insulation and splices were dried and wiped clean. The zippered jackets were not re-installed over the splices in order to prevent water accumulation and to provide separation similar to nominal conductor-to-ground spacing.

Scotch 130C Linerless Rubber Splicing Tape was used to repair and enhance the conductor insulation. A minimum of four half lapped layers of Scotch 130C was applied to the maximum extent possible to the exposed conductor insulation where the zippered jacket was removed from the six Kerite 750 MCM cables (see Drawing #2 – Page 10/12). The insulation properties provided by the tape will ensure that at least 5KV of insulation is available in this section of the cabling and that a minimum separation of approximately ¼-inch between the insulated conductors and the grounds is maintained.

The as-left phase-to-ground megger readings in megohms (1 minute/10 minute values) of the cables after cleaning and repair tasks were performed.

Cable	Phase A to	Phase B to	Phase C to		
	Ground	Ground	Ground		
1	305/347	263/292	680/838		
2 .	273/321	211/238	132/146		
3	41/55.5	135/137	68.4/73.3		
4	274/293	27.0/27	62.7/69.8		
5	32/33	16.3/15	31.6/32		
6	14.4/13.7	10.7/11.1	25.6/38.8		

2. Engineering Change Request 1066 was initiated to evaluate replacing the cables from the OPT to the termination building.

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	LICENSEE EVEN	IT REPORT (I	_ER)				
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	CRYSTAL RIVER UNIT 3	05000302	YEAR SEQUENTIAL NUMBER	REVISION NUMBER	8 OF 12		
			02 - 001 -	00			
TEXT (If mor	re space is required, use additional copies of NRC Form 366	5A)					
3.	Work Order 291891 was initiated to repeat monitor for potential insulation resistance d	1-minute mego legradation.	ger readings on the	e OPT cabl	es to		
4.	Work Order Task Profile 292154-01 was in remove water as needed.	itiated to period	dically inspect the o	cable vaults	s and		
5.	5. NCR 66692 was initiated to document the repeat failure of the OPT feeder circuit (MTM241).						
PRE\	/IOUS SIMILAR EVENTS						
No pr	revious similar events involving loss of the O	PT have been	reported to the NF	RC.			
DRAV	WINGS						
Drawing #1 – OPT Cable Layout							
Draw	Drawing #2 – OPT Cable Spice						
ΑΤΤΑ	CHMENTS						
	hment 1 - Abbreviations, Definitions, and Acro	onyms					
Attac	Attachment 2 - List of Commitments						

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NRC FORM 366A (1-2001)



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		1. FACILITY NAME		6. LER NUMBER	3. PAGE		
	CRY	STAL RIVER UNIT 3	05000302	YEAR NUMBER NUMBER	11 OF 12		
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	17. TEXT (If more space is required, use additional copies of NRC Form 366A)						
	ATTACHMENT 1 ABBREVIATIONS, DEFINITIONS AND ACRONYMS						
	BEST CFR CR-1/CR-2 CR-3 FPC ITS EGDG ES ITS NCR KV OPT RAW PRA RTP SDP V	Back-up ES Transformer Code of Federal Regulations Crystal River Units 1 and 2 Crystal River Unit 3 Florida Power Corporation Improved Technical Specifications Emergency Diesel Generator Engineered Safeguards Improved Technical Specifications Nuclear Condition Report kilovolt Offsite Power Transformer Risk Achievement Worth Probabilistic Risk Assessment Rated Thermal Power Significance Determination Proces volt	S				
	NOTES: Improved Technical Specifications defined terms appear capitalized in LER text {e.g., MODE 1} Defined terms/acronyms/abbreviations appear in parenthesis when first used {e.g., Reactor Building (RB)}.						
	EIIS codes appear in square brackets {e.g., reactor building penetration [NH, PEN]}.						

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NRC FORM 366A				U.S. NUCLEAR	REGULATO	RY COMMISSION	
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	LICENSEE EVEN	T REPORT (I	LER)				
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CRYST	AL RIVER UNIT 3	05000302	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	12 OF 12	
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17. TEXT (If more space is requ	uired, use additional copies of NRC Form 366	GA)					
	ATT	ACHMENT 2					
	LIST OF	COMMITMEN	TS				
The following table identifies those actions committed to by Florida Power Corporation in this							
document. Any other actions discussed in the submittal represent intended or planned actions by							
Elorida Power	Corporation They are described	to the NRC fo	or the N	NRC's inform	nation and	l are not	
regulatory commitmente. Please notify the Supervisor Licensing & Begulatory Programs of any							
regulatory commitments. Please noting the Supervisor, Eldensing a negatatory regulatory							
questions regarding this document of any associated regulatory communents.							
RESPONSE	сомитм	ENI					
SECTION							
	No regulatory commitments ar	e being made i	in this				
	submittal.						

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