



MAY 11 2006  
10 CFR § 50.73  
L-2006-104

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

Re: Turkey Point Unit 3  
Docket No. 50-250  
Reportable Event: 2006-001-00  
Date of Event/Discovery: March 12, 2006  
Core Alterations Performed Without Direct Communications

The attached Licensee Event Report 50-250/2006-001-00 is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B).

If there are any questions, please call Mr. Walter Parker at (305) 246-6632.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Terry O. Jones', written in a cursive style.

Terry O. Jones  
Vice President  
Turkey Point Nuclear Plant

Attachment

cc: Regional Administrator, USNRC, Region II  
Senior Resident Inspector, USNRC, Turkey Point Nuclear Plant

IE22

**LICENSEE EVENT REPORT (LER)**

Estimated burden per response to comply with this mandatory collection 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 and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@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.

<b>1. FACILITY NAME</b> Turkey Point Unit 3	<b>2. DOCKET NUMBER</b> 05000250	<b>3. PAGE</b> 1 OF 3
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**4. TITLE**  
Core Alterations Without Direct Communications

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
03	12	2006	2006	- 001 -	00	5	11	2006	FACILITY NAME	DOCKET NUMBER

<b>9. OPERATING MODE</b>  6	<b>11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR§: (Check all that apply)</b>			
<b>10. POWER LEVEL</b>  0	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(5)
<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> OTHER	
<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	Specify in Abstract below or in NRC Form 366A	
<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)		

**12. LICENSEE CONTACT FOR THIS LER**

NAME Ron Everett - Licensing Engineer	TELEPHONE NUMBER (Include Area Code) 305-246-6190
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**13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT**

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

<b>14. SUPPLEMENTAL REPORT EXPECTED</b> <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	<b>15. EXPECTED SUBMISSION DATE</b>	MONTH	DAY	YEAR
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**ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)**

On March 11, 2006 at 21:37 with Turkey Point Unit 3 in mode 6, Core Alterations commenced in the form of unlatching the control rods. Shortly thereafter, there were communication problems (headsets cutting out). The decision was made to utilize radios set to a dedicated channel. On March 12, 2006, at approximately 0400 hours, the plant commenced removal of the upper reactor vessel (RV) internals. This evolution is considered a Core Alteration as defined in the Technical Specifications (TS). TS 3.9.5 states "Direct communications shall be maintained between the control room and personnel at the refueling station." The Shift Manager had granted permission to lift the upper internals, based upon communications having been previously tested and assumed that communications would be re-established just prior to the actual lifting of the upper internals. The Shift Manager (SM) was monitoring the evolution via video monitors and recognized that communications had not been established and immediately paged the Senior Reactor Operator (SRO) inside containment at the refueling station to re-establish communications. However, since the evolution was in progress, the SRO inside containment completed the evolution and placed the RV internals on its stand, and then responded to the page from the Shift Manager. This event was a TS 3.9.5 violation for having performed Core Alterations without first establishing direct communications between the Control Room and the Refueling Station SRO. There was no adverse impact on the health and safety of the public due to this event.

**LICENSEE EVENT REPORT (LER)**  
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Turkey Point Unit 3	05000250	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	Page 2 of 3
		2006	- 001	- 00	

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

**DESCRIPTION OF EVENT**

On March 11, 2006 at 21:37 with Turkey Point Unit 3 in mode 6, Core Alterations commenced in the form of unlatching the control rods. Shortly thereafter, there were communication problems (headsets cutting out). It was later learned that the normal refueling communications were inoperable. The decision was made to utilize radios set to a dedicated channel. On March 12, 2006, at approximately 0400 hours, the plant commenced removal of the upper reactor vessel (RV)/[RCT] internals. This evolution is considered a Core Alteration as defined in the Technical Specifications (TS). TS 3.9.5 states "Direct communications shall be maintained between the control room and personnel at the refueling station." The Shift Manager had granted permission to lift the upper internals, based upon communications having been previously tested and assumed that communications would be re-established just prior to the actual lifting of the upper internals. The Shift Manager (SM) was monitoring the evolution via video monitors and recognized that communications had not been established and immediately paged the Senior Reactor Operator (SRO) inside containment at the refueling station to re-establish communications. However, since the evolution was in progress, the SRO inside containment completed the evolution and placed the RV internals on its stand, and then responded to the page from the Shift Manager. This event was a TS 3.9.5 violation for having performed Core Alterations without first establishing direct communications between the Control Room and the Refueling Station SRO. There was no adverse impact on the health and safety of the public due to this event.

**ANALYSIS OF THE EVENT**

Technical Specification Limiting Condition for Operation 3/4.9.5 states that direct communication shall be maintained between the control room and personnel at the refueling station during Core Alterations. Technical Specification Definition 1.9 states that a Core Alteration shall be the movement of any fuel, sources, reactivity control components, or other components affecting reactivity within the reactor vessel with the reactor vessel head removed and fuel in the vessel.

As stated in the Technical Specification Bases 3/4.9, Refueling Operations, the core unload sequence begins with control rod unlatching, followed by removal of the upper internals, followed by unloading fuel assemblies to the Spent Fuel Pool. At the start of unlatching of the control rods on March 11, 2006, communications between the control room and the refueling station were tested and established via the headsets. At approximately 2250 hours, during rod unlatching, personnel manning the headsets experienced difficulties with communications. To overcome these difficulties, radios were delivered to the refueling platform to be used instead of headsets and subsequently, communications were re-established in accordance with 3-OP-38.1 Attachment 4, "Minimum Equipment Checklist for Restart for Movement of Control Rods or Upper Internals."

Subsequently, commencing reactor vessel upper internals movement without having re-established direct communications between the control room and the refueling station is considered a Technical

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Specification 3/4.9.5 violation. This event is reportable in accordance with 10CFR50.73(a)(2)(i)(B) as an operation or condition that is prohibited by the plant's Technical Specifications.

**CAUSE OF THE EVENT**

The apparent cause of the event was that the shift manager failed to verify communications were re-established or have it performed. Additionally, the procedure used to lift the internals by the containment crew did not require verification of communications prior to the lift.

**SAFETY SIGNIFICANCE**

The Technical Specification Bases indicate that the requirement for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during Core Alterations. The reactor was shutdown and the refueling outage was in progress. There was no adverse impact to safety systems or components that are needed to shutdown the reactor and maintain safe shutdown conditions, remove residual heat, control the release of radioactive material, or mitigate the consequences of an accident due to this event. All systems maintained their ability to perform as designed. Technical Specifications 3/ 4.9.5 applies only during refueling operations and only when moving items within the reactor vessel as specified in TS definition for Core Alterations. Based on the above, there was no impact to the health and safety of the public.

**CORRECTIVE ACTIONS**

- 1) Immediately re-established and maintained communications between the control room and refueling station during core alterations.
- 2) The shift manager was coached to maintain his oversight role.
- 3) The procedures for removal and installation of the reactor vessel upper internals will be revised to ensure compliance with Technical Specification 3.9.5

**ADDITIONAL INFORMATION**

EIIS Codes are shown in the format [EIIS SYSTEM: IEEE system identifier, component function identifier, second component function identifier (if appropriate)].

FAILED COMPONENTS:       None

**SIMILAR EVENTS:**

A review of the LERs issued over the last three years revealed no similar occurrences