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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8809290361 DOC. DATE: 88/09/21 NOTARIZED: NO DOCKET #
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 AUTH. NAME AUTHOR AFFILIATION
 GROSS, K.W. Florida Power & Light Co.
 CONWAY, W.F. Florida Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION

SUBJECT: LER 88-018-00: on 880822, ECCS pump suction isolation due to procedure inadequacy.

W/8 ltr.

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 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Turkey Point Unit 3	DOCKET NUMBER (2) 0 5 0 0 0 2 5 0	PAGE (3) 1 OF 0 3
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TITLE (4)
Emergency Core Cooling System Pump Suction Isolation Due to Procedure Inadequacy

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 NAMES		DOCKET NUMBER(S)
0 8	2 2	8 8	8 8	0 1 8	0 0	0 9	2 1	8 8	Turkey Point Unit 4		0 5 0 0 0 2 5 1
											0 5 0 0 0

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)											
POWER LEVEL (10) 1 0 0	20.402(b)			20.405(c)			50.73(a)(2)(iv)			73.71(b)		
	20.405(a)(1)(i)			50.36(c)(1)			<input checked="" type="checkbox"/> 50.73(a)(2)(v)			73.71(c)		
	20.405(a)(1)(ii)			50.36(c)(2)			<input checked="" type="checkbox"/> 50.73(a)(2)(vii)			OTHER (Specify in Abstract below and in Text, NRC Form 365A)		
	20.405(a)(1)(iii)			<input checked="" type="checkbox"/> 50.73(a)(2)(i)			50.73(a)(2)(viii)(A)					
	20.405(a)(1)(iv)			<input checked="" type="checkbox"/> 50.73(a)(2)(ii)			50.73(a)(2)(viii)(B)					
	20.405(a)(1)(v)			50.73(a)(2)(iii)			50.73(a)(2)(x)					

LICENSEE CONTACT FOR THIS LER (12)

NAME Karl W. Gross, Compliance Engineer	TELEPHONE NUMBER
	AREA CODE 3 0 5 2 4 6 - 6 7 4 9

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	0 4	0 1	8 9

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

On August 22, 1988, Turkey Point Units 3 and 4 were operating in mode 1 at 100 % power when it was determined that during the performance of the monthly Emergency Core Cooling System (ECCS) Valve Cycling surveillance, the Refueling Water Storage Tank (RWST) supply to the ECCS was isolated from both trains of the ECCS system including Residual Heat Removal, Containment Spray and High Pressure Safety Injection. Also during the surveillance, both trains of RHR were isolated from the RWST during cycling of two other valves. The root cause was determined to be procedural inadequacy in that translation of the standard technical specification requirements into O-ADM-021, Technical Specification Implementation Procedure, did not adequately reflect the Turkey Point design. Some Westinghouse plants have parallel RWST valves unlike the Turkey Point units which have valves in series. Corrective actions include revisions to the surveillance procedure and O-ADM-021.

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 8	0 1 8	0 0	0 2	OF	0 3

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

EVENT

On August 22, 1988 Turkey Point Units 3 and 4 were operating at 100% power when plant procedures 3/4-OSP-206.6, Emergency Core Cooling System (ECCS) Monthly Valve Cycling, were determined to place the units in a condition that alone could have prevented the fulfillment of a safety function.

The condition was identified by a system engineer (non-licensed contractor) who was investigating the validity of section 7 of procedure 3/4-OSP-206.6, which required the Residual Heat Removal (RHR, EIIS System Code BP) pumps being put in the pull to stop position in order to prevent an inadvertent start of the RHR pumps during valve testing, in effect removing both trains of RHR from service. Based on current Technical Specifications (TS), this condition is acceptable for one hour only during modes 5 and 6 (Cold Shutdown and Refueling). Further review of the procedure showed that valves 864 A and B and 862 A and B were momentarily closed for testing during all modes of power.

The 864 A and B valves are the series Refueling Water Storage Tank outlet isolation valves to the ECCS systems. The 862 A and B valves are the series Residual Heat Removal pump suction isolation valves. When either of the 864 valves are closed, both trains of RHR, Containment Spray (EIIS System Code BE), and two of four High Pressure Safety Injection Pumps (EIIS System Code BQ) are isolated from their supply of water. With either of the 862 valves closed, both trains of RHR are isolated from their supply of water.

The 864 and 862 valves were cycled 16 times each between the date procedures 3/4-OSP-206.6 were issued and the date of discovery. Each procedure's performance requires each of the valves to be cycled shut then reopened.

Cause of Event

O-ADM-021, Technical Specification Implementation Procedure, was derived from Westinghouse's version of Technical Specifications applicable to Westinghouse Plants. O-ADM-021 requires monthly cycling of RWST outlet valves. This was interpreted to mean 864 A and B and 862 A and B. The root cause was determined to be procedural inadequacy in that translation of the standard technical specification requirement O-ADM-021 did not adequately reflect the Turkey Point design. Some Westinghouse plants have parallel RWST valves unlike the Turkey Point units which have valves in series.

Analysis of Event

The valves identified are in series, and during normal operation are locked open with power removed. During the conduct of the identified surveillance tests, the valves were cycled shut, then immediately reopened. During the limited time the valves were being cycled (estimated at less than 5 minutes per valve per performance), the High Pressure Safety Injection, Containment Spray, and/or RHR pumps were without a supply of water, with the RHR pump start feature being disabled.

FACILITY NAME (1) Turkey Point Unit 3	DOCKET NUMBER (2) 0 5 0 0 0 2 5 0	LER NUMBER (8)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		8 8	0 1 8	0 0	0 3	OF 0 3

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

The consequences of a design basis event with the ECCS pumps isolated, taking into consideration the expected operator intervention, will be evaluated. A supplemental report will be issued upon conclusion of this evaluation.

Corrective Action

- 1) On August 23, 1988 procedures 3/4-OSP-206.6 were revised to exclude monthly cycling of the RWST outlet valves.
- 2) O-ADM-021 will be revised by October 1, 1988.
- 3) The event will be evaluated to determine the consequences of a design basis event with the ECCS pumps isolated, based on expected operator response.

Additional Information

Similar occurrences: none

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108



L-88-421
10 CFR 50.73

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

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Reportable Event: 250-88-18
Date of Event: August 22, 1988
Emergency Core Cooling System
Pump Suction Isolation Due to Procedure Inadequacy

The attached License Event Report (LER) is being submitted pursuant to the requirements of 10 CFR 50.73 to provide notification of the event.

Very truly yours,

W. F. Conway

W. F. Conway
Senior Vice President - Nuclear

WFC/SDF/gp

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator,
Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

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