

FEB 22 1983

Docket Nos. 50-250
and 50-251

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Dr. Robert E. Uhrig, Vice President
Advanced Systems and Technology
Florida Power and Light Company
Post Office Box 529100
Miami, Florida 33152

Dear Dr. Uhrig:

SUBJECT: BLOCKING OF STEAM LINE HIGH DIFFERENTIAL PRESSURE SAFETY INJECTION
SIGNAL (SI) DURING COOLDOWN

We have noted during inspections and reviews of Pressurized Water Reactors (PWR) facilities, that some facilities block the SI signal during cooldown in a manner inconsistent with their Technical Specifications. We have completed our review of all the PWR facilities and determined that there is a question in this regard for the Turkey Point Plant, Units 3 and 4. We have provided additional details and identified our concerns in the enclosure to this letter.

Your response is requested within 30 days from the receipt of this letter. This letter affects fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

Original signed by:
S. A. Varga

Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Enclosure:
As stated

cc w/enclosure:
See next page

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OFFICE	ORB#1:DL	ORB#1:DL	ORB#1:DL				
SURNAME	DMcDonald	MGrotenhuis	SVarga				
DATE	02/07/83	02/12/83	02/12/83				

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Robert E. Uhrig
Florida Power and Light Company

cc: Harold F. Reis, Esquire
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Resident Inspector
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ENCLOSURE

DISCREPENCIES IN TECHNICAL SPECIFICATION
REQUIREMENTS FOR ESF CHANNEL OPERABILITY

Technical specifications set forth the operability requirements for engineered safety feature actuation (ESF) channels which specify actions which are to be taken when ESF channels are inoperable. For those plants which use the format of the current standard technical specifications, the operability requirements are stated in terms of defined operating modes. Thus during some operating modes the operability requirements are not applicable. For older plants the operability requirements of ESF channels are determined based on the action statements imposed when the minimum operability requirements are not met. Generally, the action is identified as either hot shutdown or cold shutdown.

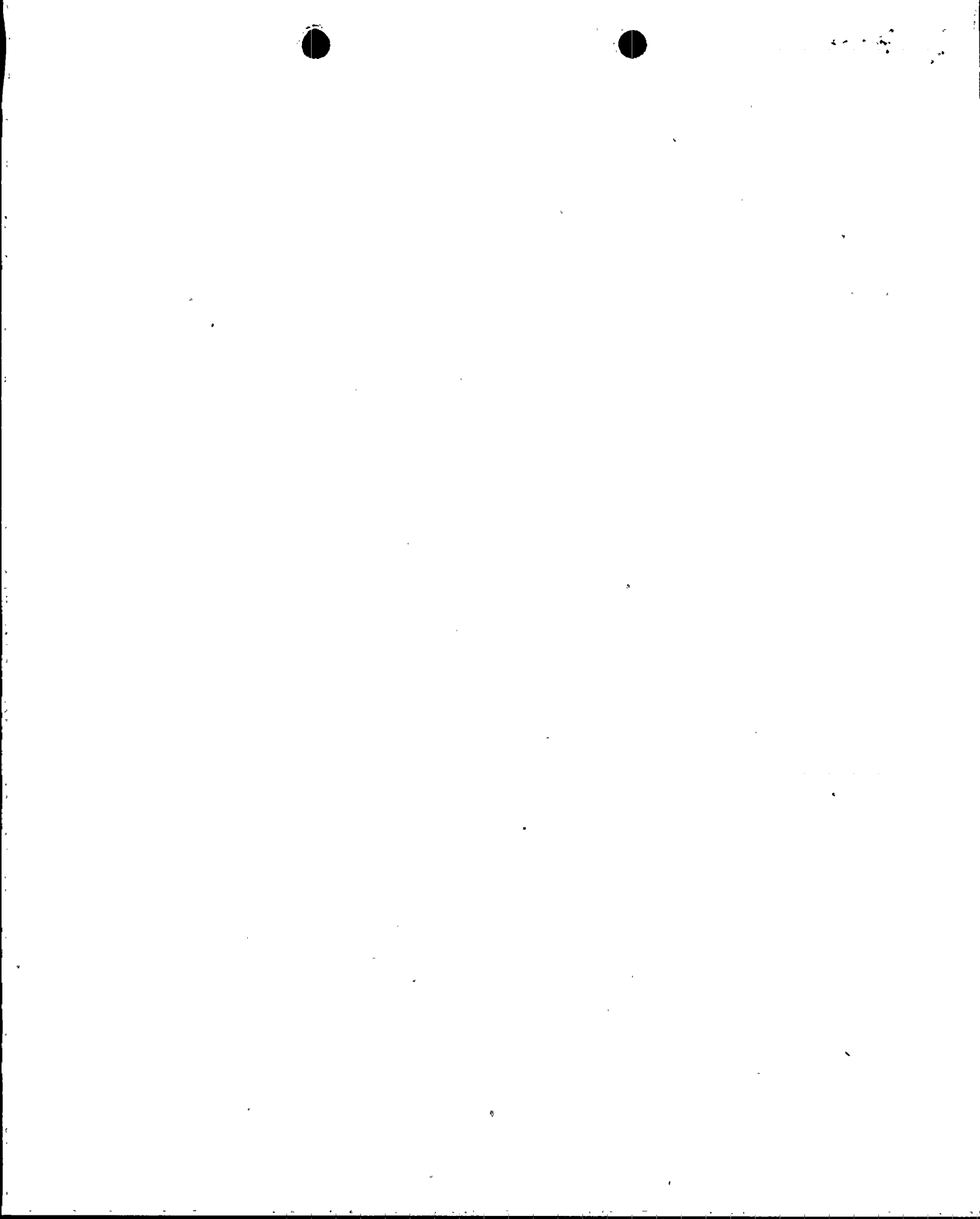
When an operating bypass is provided which prevents the actuation of ESF systems, the technical specifications indicate the conditions under which the interlock or blocking action takes place. This precludes a conflict with the operability requirements under conditions where the ESF channel is rendered inoperable due to an operating bypass. The failure to identify conditions under which safety actions are blocked by an operating bypass, is considered a violation of the operability requirements for that channel. Thus, in order to preclude such conflicts, technical specification should be explicit with regards to identifying the conditions under which operating bypasses will block ESF channels.

While current standard technical specifications identify operating bypasses, it has been found that some Westinghouse plants do not currently identify

all operating bypasses under the operability requirements of ESF channels. This concern has been identified as multiplant action B-32. Therefore, a review was conducted of the operability requirements for ESF channels for all licensed Westinghouse plants. The channels which initiate safety injection on low pressurizer pressure always include an operating bypass to permit plant shutdown. The channels which sense steam line breaks and actuate safety injection and/or steam line isolation may or may not include a manually initiated operating bypass.

In some cases the FSAR includes sufficient detail that identifies operating bypasses. In other cases, the use of the standard technical specification format provides sufficient assurance that operating bypasses have been adequately addressed. Operating bypasses provided to block safety injection may or may not block steam line isolation where these safety actions are initiated by the same ESF channels. Since the FSAR's for many of the older plants do not address operating bypasses, this review could not confirm that the technical specifications reflect conditions under which ESF channels may be inoperable due to an operating bypass.

A number of errors and other problems were identified in the technical specifications for some plants during this review. These plants should be advised that the failure to identify conditions under which safety actions are blocked by an operating bypass is considered a violation of the technical



specification operability requirements when those channels are blocked by an operating bypass. Licensees should propose changes to their technical specifications if these problems exist. Also, for those plants for which other problems have been noted, they should take appropriate action to resolve the concerns identified.

The specific concerns identified for the Turkey Point Plant, Units 3 and 4 are:

Table 3.5-2 does not indicate any conditions under SAFETY INJECTION initiated on High Differential Pressure between any Steam Line and the Steam Line Header, or High Steam Flow in 2/3 Steam Lines with Low T-ave or Low Steam Line Pressure may be blocked. Item 2.1 in Table 3.5-3 does not indicate any conditions under which STEAM LINE ISOLATION may be blocked.

In order to resolve the above concerns provide the following:

1. Determine if the existing Technical Specifications identified above are correct. Provide the drawings or other basis used in making the determination,
or
2. If it is determined that the existing Technical Specifications are incorrect, provide the proposed revisions including the basis for their acceptability.

