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MEMORANDUM FOR: C. J. Heltemes, Jr., Director
Office for Analysis and Evaluation
of Operational Data

FROM: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

SUBJECT: PROPOSED ABNORMAL OCCURRENCE - LOSS OF AUXILIARY
FEEDWATER SYSTEM AT TURKEY POINT

As requested in your memorandum of June 24, 1983, we have reviewed the proposed abnormal occurrence (AO) writeup for the Turkey Point loss of auxiliary feedwater event of April 19, 1983. We find the proposed writeup to be in general agreement with the NRR proposed AO writeup of June 2, 1983 (reference Eisenhut to Heltemes memorandum).

We do, however, have a comment on the AO writeup regarding the cause of the incorrect valve alignment. Page 5 of the writeup states that it is "virtually impossible" to mistakenly identify the valves that were misaligned, thus causing the unavailability of the auxiliary feedwater system. This statement does not appear to be consistent with page 6 of the writeup which states that both the NRC and licensee concluded the "personnel error appeared to be the major cause."

These statements along with the inability of the twice-per-shift AFW system checks to identify the valve misalignment certainly suggest the possibility of intentional tampering with the valves. Due to the recent NRC concern regarding events of the type (i.e., IE Information Notice 83-27, "Operational Response to Events Concerning Deliberate Acts Directed Against Plant Equipment" dated May 4, 1983), we believe that the possibility should be addressed. Such a discussion was included in the NRR proposed AO writeup.

Therefore we recommend the following modifications:

1. Include a discussion that the licensee initially considered the possibility of intentional tampering but later ruled it out; and
2. If personnel error was indeed the cause of the event, page 5 should be modified so that the AO report does not say that it is "virtually impossible" to mistakenly identify the valves in question.

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Original Signed by
H. R. Denton

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

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