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SUBJECT: LER 89-012-00:on 890927,A loop of wide range containment water level indication de-energized for time period.
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L-89-387
10 CFR 50.73

OCT 27 1989

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

Gentlemen:

Re: Turkey Point Unit 4
Docket No. 50-251
Reportable Event: 89-12
Date of Event: September 27, 1989
"A" Loop of Wide Range Containment Water Level Indication De-energized for a Time Period which Exceeded Action Statement 1 of Technical Specification Table 3.5-5, Item 9

The attached Licensee Event Report is being submitted pursuant to the requirements of 10 CFR 50.73 to provide notification of the subject event.

Very truly yours,

K. N. Harris by JE Cross
K. N. Harris
Vice President
Turkey Point Plant Nuclear

KNH/STD/rat

cc: Stewart D. Ebneter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

IE22
1/1

NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO 3150-0104
EXPIRES 8/31/88

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Turkey Point Unit 4	0 5 0 0 0 2 5 1	1 OF 0 3

TITLE (4) "A" Loop of Wide Range Containment Water Level Indication De-energized for a Time Period Which Exceeded Action Statement 1 of Technical Specification Table 3.5-5, Item 9

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 5 0 0 0
0 9	2 7	8 9	8 9	0 1 2	0 0	1 0	2 7	8 9		0 5 0 0 0

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)			
	5	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)	0 0 0	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		20.405(a)(1)(iv)	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	TELEPHONE NUMBER
	AREA CODE
David R. Powell - Regulation and Compliance Supervisor	3 0 5 2 4 6 - 6 5 5 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)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

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

On September 27, 1989, 0930, an individual in the Operations Support Group (non-licensed contractor personnel) reported finding one of the two wide range containment water level indicators (LI-4-6309A) de-energized. This condition was reported to the Plant Supervisor - Nuclear (licensed utility personnel) and LI-4-6309A was re-energized. At 1050, it was noted that LI-4-6309A did not display the proper Emergency Response Data Acquisition and Display System (ERDADS) response following re-energization. A Plant Work Order (PWO) was initiated to correct this condition. The "A" loop of wide range containment water level indication was established as de-energized on July 12, 1989. The last time the subject loop was established as functional was on October 5, 1988. This condition placed the unit in a condition outside of Technical Specification 3.5, Table 3.5-5, Item 9, Action Statement 1. FPL believes that de-energization of LI-4-6309A and damage to the cable connection to LY-4-6309A were both due to non-cognitive error by utility/contractor personnel. Bump covers will be placed on the containment level receivers in the containment penetration rooms to prevent the receivers from being inadvertantly de-energized. A periodic check to ensure that the containment water level loops are energized has been added to the appropriate surveillance procedure.

*U.S.GPO:1984-0-464-481/18750

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE 3
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Turkey Point Unit 4	0 5 0 0 0 2 5 1	8 9	— 0 1 2	— 0 0	0 2 OF 0 3

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

Event

On September 27, 1989, at 0930, an individual in the Operations Support Group (non-licensed contractor personnel) reported finding one of the two wide range containment water level indicators (LI-4-6309A) (EIIS: IP) de-energized. This condition was reported to the Plant Supervisor - Nuclear (licensed utility personnel) and LI-4-6309A was re-energized. At 1050, it was noted that LI-4-6309A did not display the proper Emergency Response Data Acquisition and Display System (ERDADS) (EIIS: IQ) response following re-energization. A Plant Work Order (PWO) was initiated to correct this condition.

Maintenance personnel (non-licensed utility personnel) observed that the cable from LI-4-6309A to its associated receiver (LY-4-6309A) was damaged at the receiver connection (LY-4-6309A). One of the two cable wires at the receiver connection was found to be damaged at the solder point. On September 28, 1989, LI-4-6309A was returned to service.

Subsequent to the identification that the "A" loop of wide range containment water level indication was de-energized, a fourteen day ERDADS printout was reviewed which revealed that LI-4-6309A had been de-energized from September 14 through September 28, 1989. A further review of existing ERDADS' tapes established that July 12, 1989, was the latest date that the "A" loop of wide range containment water level could be firmly established as being de-energized. Prior to September 28, 1989, the last time the "A" loop of wide range containment water level indication was established as functional upon completion of 4-PMI-061.7, "Containment Water Level Loop L-4-6309A Calibration," on October 5, 1988.

Technical Specification (TS) 3.5, Table 3.5-5. Item 9, "Containment Water Level (Wide Range)," requires a total of two channels and a minimum of one channel of wide range containment water level indication to be operable. If two channels are not available, then Action Statement 1 applies. Action Statement 1 of TS Table 3.5-5 requires the unit to be placed in at least Mode 4 (Hot Shutdown) if the number of operable accident monitoring instrumentation channels is less than the total number of channels shown in Table 3.5-5 for seven days. During the period of time that the "A" loop of wide range containment water level was established as de-energized, Unit 4 was unknowing placed in various operational that would not have been permitted by the Limiting Condition of Operation in Action Statement 1 of TS Table 3.5-5. Action Statement 1 of TS Table 3.5-5 did not apply until Unit 4 was placed in Mode 3 (Hot Standby) in May, 1989.

Cause of the Event

FPL believes that de-energization of LI-4-6309A and damage to the cable connection to LY-4-6309A were both due to non-cognitive error by utility/ contractor personnel. Although it is unlikely that both conditions occurred at the same time, unintentional personnel actions are believed to be responsible.

The monthly surveillance identified in 4-OSP-204, "Accident Monitoring Instrumentation Channel Checks," provides a channel check of the wide range containment water level indication loops. This channel check is normally adequate to meet the requirements of the monthly surveillance required by TS Table 4.1-1, Item 35. However, for cases where a group of indicators continuously read zero during normal operation, this channel check does not establish operability of the indicators. This contributed to the event.

Analysis of the Event

Technical Specification 3.5, Table 3.5-5, Item 9, Action Statement 2 requires the Unit to be placed in at least Mode 4 in the event the number of operable accident monitoring instrumentation channels is less than the requirements of TS Table 3.5-5. The redundant loop of wide range containment water level indication was not out-of-service for a time period greater than 48 hours, during the time period that Action Statement 2 of TS Table 3.5-5 would have applied (May through September 1989). Therefore, the Technical Specification requirement for the minimum number of operable channels of wide range containment water level indication was met during this time period.

From October 5, 1988 to May 1, 1989, Unit 4 was in an extended refueling outage and Action Statement 2 of TS Table 3.5-5 did not apply (Modes 4, 5, and 6).

Corrective Actions

1) Bump covers will be placed on the containment water level indication receivers in the containment penetration rooms to prevent the receivers from being inadvertantly de-energized. This will be completed by December 28, 1989.

2) An On The Spot Change was issued to Surveillance procedure, 0-OSP-200.1, "Schedule of Plant Checks and Surveillances," to add a periodic check that verifies the wide and narrow range containment water level, and containment pressure indication loops are energized.

3) An investigation of other accident monitoring instrumentation as presented in Tables 7.5-1 and 7.5-2 of the Final Safety Analysis Report has been performed. This investigation established a list of accident monitoring instrumentation which could be de-energized without the operator's knowledge. Corrective Actions similar to those taken in Corrective Action Number 2 will be initiated as appropriate. The procedure changes will be issued by November 28, 1989.

Additional Information

No LERs with a similar root cause were identified.