

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9006260127      DOC. DATE: 90/06/15      NOTARIZED: NO      DOCKET #  
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light Co      05000250  
 AUTH. NAME      AUTHOR AFFILIATION  
 POWELL, D.R.      Florida Power & Light Co.  
 HARRIS, K.N.      Florida Power & Light Co.  
 RECIPIENT NAME      RECIPIENT AFFILIATION

SUBJECT: LER 90-010-00: on 900518, Tech Spec violation due to entering  
 Mode 3 w/o having at least one channel of RVLMS in-service.  
w/9      ltr.

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|           | RES/DSIR/EIB              | 1 1                | RGN2 FILE 01              | 1 1                |
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JUN 15 1990

L-90-220  
10 CFR 50.73

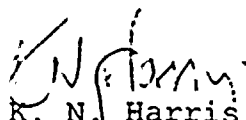
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Attn: Document Control Desk  
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Gentlemen:

Re: Turkey Point Units 3  
Docket No. 50-250  
Reportable Event: 90-010  
Date of Event: May 18, 1990  
Technical Specification Violation Due To Entering Mode 3  
Without Having At Least One Channel Of The Reactor Vessel  
Level Monitoring System In-Service

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

Very truly yours,

  
R. N. Harris  
Vice President  
Turkey Point Plant Nuclear

KNH/DRP/MKA/mka

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

9006260127 900615  
PDR ADCK 05000250  
PDC  
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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Turkey Point Unit 3 DOCKET NUMBER (2) 0510101250101013 PAGE 3

TITLE (4) Technical Specification Violation Due to Entering Mode 3 Without Having At Least One Channel Of The Reactor Vessel Level Monitoring System In-Service

| 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   | 18   | 9              | 0                 | 9               | 0               | 0   | 1    | 0                             | 0 | 0                | 0 |
| 0              | 5   | 18   | 9              | 0                 | 9               | 0               | 0   | 1    | 0                             | 0 | 0                | 0 |

OPERATING MODE (8) 3 THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 2. Check one or more of the following: (11)

|                        |                                            |                                                    |                                              |                                                             |
|------------------------|--------------------------------------------|----------------------------------------------------|----------------------------------------------|-------------------------------------------------------------|
| POWER LEVEL (10) 0,0,0 | <input type="checkbox"/> 20.402(b)         | <input type="checkbox"/> 20.406(c)                 | <input type="checkbox"/> 50.73(a)(2)(iv)     | <input type="checkbox"/> 73.71(b)                           |
|                        | <input type="checkbox"/> 20.406(a)(1)(i)   | <input type="checkbox"/> 50.36(e)(1)               | <input type="checkbox"/> 50.73(a)(2)(v)      | <input type="checkbox"/> 73.71(c)                           |
|                        | <input type="checkbox"/> 20.406(a)(1)(ii)  | <input type="checkbox"/> 50.36(e)(2)               | <input type="checkbox"/> 50.73(a)(2)(vi)     | OTHER (Specify in Abstract Below and in Text NRC Form 366A) |
|                        | <input type="checkbox"/> 20.406(a)(1)(iii) | <input checked="" type="checkbox"/> 50.73(a)(2)(i) | <input type="checkbox"/> 50.73(a)(2)(vii)(A) |                                                             |
|                        | <input type="checkbox"/> 20.406(a)(1)(iv)  | <input type="checkbox"/> 50.73(a)(2)(ii)           | <input type="checkbox"/> 50.73(a)(2)(vii)(B) |                                                             |
|                        | <input type="checkbox"/> 20.406(a)(1)(v)   | <input type="checkbox"/> 50.73(a)(2)(iii)          | <input type="checkbox"/> 50.73(a)(2)(ix)     |                                                             |

LICENSEE CONTACT FOR THIS LER (12) NAME: David R. Powell, Licensing Superintendent TELEPHONE NUMBER: 305246-6559 AREA CODE: 305

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

| CAUSE (SYSTEM) | COMPONENT | MANUFAC TURE | REPORTABLE TO NRC | CAUSE (SYSTEM) | COMPONENT | MANUFAC TURE | REPORTABLE TO NRC |
|----------------|-----------|--------------|-------------------|----------------|-----------|--------------|-------------------|
|                |           |              |                   |                |           |              |                   |
|                |           |              |                   |                |           |              |                   |

SUPPLEMENTAL REPORT EXPECTED (14) YES (If you complete EXPECTED SUBMISSION DATE) NO X

EXPECTED SUBMISSION DATE (15) MONTH: DAY: YEAR:

ABSTRACT (Limit to 1400 spaces or approximately fifteen single space typewritten lines) (16)

On May 18, 1990, at 1915 EDT, contrary to the requirements of Technical Specification (TS) 3.0.4, Unit 3 entered Mode 3 without having at least one channel of the reactor vessel level monitoring system (RVLMS) in service as required by TS table 3.5-5 item 15. Furthermore, the 48 hour Limiting Condition for Operation (LCO) associated with TS table 3.5-5, action item 9 was exceeded on May 19, at 1751 EDT. RVLMS is part of the Qualified Safety Parameter Display System (QSPDS). This condition was not discovered until May 21, 1990 at 1120 EDT. Channels A and B were taken out of service to troubleshoot open lines discovered on channel A during performance of procedure 3-GMI-041.2, "ICCS MI Cable Reconnecting." A clearance order was used to open power supply breakers feeding the channels' thermocouples heaters. The cause of this event was non-cognitive personnel error by a plant licensed operator. The operator reviewed only the index section of the clearance order book prior to the unit entering Mode 3. Upon discovery, the HJTC breakers were closed. Procedures 3/4-GOP-503 and 3/4-GOP-301 will be revised to require a thorough review of the clearance order book prior to Mode changes.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (3)

PAGE (3)

Turkey Point Unit 3

0 | 5 | 0 | 0 | 0 | 2 | 5 | : | 0 | 9 | 0 | - | 0 | 1 | 0 | - | 0 | 0 | 0 | 2 | OF | 0 | 3

TEXT (If more space is required, use additional NRC Form 200A's (17)

I DESCRIPTION OF EVENT

On May 18, 1990, at 1915 EDT, contrary to the requirements of Technical Specification (TS) 3.0.4, Unit 3 entered Mode 3 without having at least one channel of the reactor vessel level monitoring system (RVLMS) (EIIS:IG) in service as required by TS table 3.5-5 item 15. Furthermore, the 48 hour Limiting Condition for Operation (LCO) associated with TS table 3.5-5, action item 9 was exceeded on May 19, at 1751 EDT. This condition was not discovered until May 21, 1990 at 1120 EDT. The Instrumentation and Control (I&C) Group discovered the four power supply breakers to the Reactor Vessel Level Monitoring System (RVLMS) Heated Junction Thermocouples (HJTC) open. With the breakers in this position, the heaters for Unit 3's thermocouples were de-energized. Because of this, RVLMS channels A and B were considered inoperable.

On May 17, 1990, at 1751 EDT, a clearance was issued on the four breakers which supply power to the heated junction thermocouple (HJTC) heaters for channels A and B of the Quality Safety Parameter Display System (QSPDS). Channels A and B were taken out of service to troubleshoot open lines discovered on channel A during performance of procedure 3-GMI-041.2, "ICCS MI Cable Reconnecting," section 6.7.3.1. Two of the eight sensors for channel A were found open. The Equipment Out Of Service (EOOS) logbook was updated to reflect this condition.

On May 18, 1990, in preparation for the upcoming mode change (mode 5 to mode 4), the Plant Supervisor Nuclear (PSN) instructed the reactor control operator (RCO) to review the clearance order book to determine if any equipment required for entry into Mode 4 was out of service. The operator reviewed only the index section of the clearance order book. In addition to this, a review of the EOOS logbook was conducted by the PSN. Both logbooks indicated no equipment was out of service required for entry into Mode 4. At 0415, channels A and B were declared back in service by the PSN based on this log review and a visual channel check of the QSPDS display for the heated and unheated thermocouples. Unit 3 at 0535, entered Mode 4. At 1535, the requirements associated with entry into Mode 3 were found to be met. Unit 3 entered Mode 3 at 1915.

II CAUSE OF EVENT

The cause of this event was non-cognitive personnel error in that a plant licensed operator failed to perform a comprehensive review of the clearance order book. After being instructed to review the clearance order book, the Unit 3 peak shift RCO proceeded to review the index section of the book only. This section contained no clearance orders written against either channel of the QSPDS. Based on this, the RCO notified the APSN who informed the PSN that no clearances existed which would hold up a Mode 4 entry.

Several factors that contributed to the event are shown below:

- 1) Procedure 3-GOP-503 used to transition from modes 5 to 3 did not have steps requiring the clearance order book to be checked.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

|                     |                       |                |                   |                 |          |        |
|---------------------|-----------------------|----------------|-------------------|-----------------|----------|--------|
| FACILITY NAME (1)   | DOCKET NUMBER (2)     | LER NUMBER (3) |                   |                 | PAGE (3) |        |
|                     |                       | YEAR           | SEQUENTIAL NUMBER | REVISION NUMBER |          |        |
| Turkey Point Unit 3 | 0 5 1 0 0 1 0 1 2 5 0 | 9 0            | 0 1 0             | 0 0             | 0 3      | OF 0 3 |

TEXT IS MORE SPACED TO FIT. USE ADDITIONAL NRC Form 355A-1117

- 2) Operations personnel observed the QSPDS display temperature values and did not notice that the unheated and heated thermocouples had temperature values which were very similar. A delta of about 100 degrees should exist between the unheated and heated junction thermocouple temperatures.

III ANALYSIS OF EVENT

TS 3.0.4 was violated when Unit 3 entered Mode 3 with the LCO for TS table 3.5-5 action item 9 still in effect. This TS prohibits a mode change unless the conditions for the LCO were met. Violation of TS table 3.5-5 action item 9 occurred when the 48 hour LCO was exceeded.

Channels A and B of the RVLMS are part of the post accident monitoring system. During the time when both channels were out of service, the reactor vessel inventory was full and the reactor was not critical. The unit was being returned from an extended refueling outage and very little decay heat existed. Had a loss of inventory occurred, the accumulators, safety injection (SI) and residual heat removal (RHR) were available to mitigate this occurrence. Therefore, the health and safety of the public were not impacted by this incident.

IV CORRECTIVE ACTIONS

- 1) After discovering the open HJTC breakers they were closed. This action was completed on May 21, 1990.
- 2) Procedures 3/4-GOP-503 and 3/4-GOP-301 will be revised to require the PSN to conduct a comprehensive clearance order book review prior to a Mode change. This revision will be completed by June 15, 1990.
- 3) A change to procedure 3-OSP-204 is being submitted which will have new acceptance criteria for the temperature ranges. This will be completed by June 30, 1990.
- 4) Briefings to explain the system theory behind the RVLMS were given to all operations control room personnel. This was completed by May 29, 1990.
- 5) System Engineering is writing a brief system description which will discuss system theory for the RVLMS. This will be completed by July 31, 1990. When completed it will be required reading for the operators. This will serve as a reinforcement to the briefings given to operations personnel in corrective action number 4.

V ADDITIONAL INFORMATION

No similar LERs of this type have been identified.