

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9110110207 DOC.DATE: 91/10/04 NOTARIZED: NO DOCKET #
 FACIL:50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 AUTH.NAME AUTHOR AFFILIATION
 POWELL,D.R. Florida Power & Light Co.
 PLUNKETT,T.F. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 91-006-00:on 910921,RWST had less than 320,000 gallons of borated water required by TS 3/4.5.4 & safety injection pumps not aligned to operable flow path.Caused by procedural inadequacy.Pumps realigned.W/911004 ltr.

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EXTERNAL:	EG&G BRYCE,J.H	3 3	L ST LOBBY WARD	1 1
	NRC PDR	1 1	NSIC MURPHY,G.A	1 1
	NSIC POORE,W.	1 1	NUDOCS FULL TXT	1 1

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OCT 04 1991

L-91-250
10 CFR 50.73

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

Gentlemen:

Re: Turkey Point Unit 3
Docket No. 50-250
Reportable Event: 91-006-00
Date of Event: September 21, 1991
Mode Change Without Meeting the Requirements of Technical
Specification 3.0.4 Due to Inadequate Procedural Guidance

The attached Licensee Event Report 250-91-006-00 is being provided in accordance with the requirements of 10 CFR 50.73 (a)(2)(i) to provide notification of the subject event.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

TFP/DPS/ds

enclosures

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

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <p style="text-align: center;">TURKEY POINT UNIT 3</p>	DOCKET NUMBER (2) <p style="text-align: center;">05000250</p>	PAGE (3) <table style="width: 100%; text-align: center;"> <tr> <td style="width: 10%;">1</td> <td style="width: 10%;">OF</td> <td style="width: 10%;">3</td> </tr> </table>	1	OF	3
1	OF	3			

TITLE (4)
MODE CHANGE WITHOUT MEETING REQUIREMENTS OF TECHNICAL SPECIFICATION 3.0.4 DUE TO INADEQUATE PROCEDURAL GUIDANCE

EVENT DATE (5)			LER NUMBER(6)			RPT DATE (7)			OTHER FACILITIES INV. (8)		
MON	DAY	YR	YR	SEQ #	R#	MON	DAY	YR	FACILITY NAMES		DOCKET # (5)
09	21	91	91	006	00	10	04	91	TURKEY POINT UNIT 4		05000251
OPERATING MODE (9)		3		<u>10 CFR 50.73(a)(2)(i)</u>							
POWER LEVEL (10)		000									

LICENSEE CONTACT FOR THIS LER (12)

David R. Powell, Superintendent of Licensing	TELEPHONE NUMBER
	305-246-6559

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	NPRDS?	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	NPRDS?

SUPPLEMENTAL REPORT EXPECTED (14) NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
(if yes, complete EXPECTED SUBMISSION DATE)				

ABSTRACT (16)

On September 21, at 0340, contrary to the requirements of Technical Specification (TS) 3.0.4, Unit 3 entered Mode 3. Unit 4's Refueling Water Storage Tank (RWST) had less than the 320,000 gallons of borated water required by TS 3/4.5.4 for an operable RWST. The Unit 4 Safety Injection (SI) Pumps' suction was aligned to the Unit 4 RWST. Therefore, both Unit 4 SI pumps were inoperable because they were not aligned to an operable flow path. Action e. of TS 3.5.2 allows 72 hours to restore one of the Unit 4 SI pumps to operable status or be in Mode 3 in an additional 6 hours and Mode 4 within the following 6 hours. This condition was discovered on September 23, 1991, at 2340. The Unit 4 SI Pumps were made operable at 0100 on September 24, 1991, by opening the cross-connect valves allowing them to take suction from the Unit 3 RWST. The Unit 3 RWST was operable since it contained more than 320,000 gallons of borated water. Thus the Action requirements of TS 3.5.2 were met. The root cause of this event was procedural inadequacies which did not require the system configuration to consider RWST operability in the acceptance criteria for system operability. Procedures 3/4-OP-062, "Safety Injection"; 3/4-OSP-201.1, "RCO Daily Logs"; 3/4-OSP-202.1, "Safety Injection/Residual Heat Removal Flowpath Verification"; and 3/4-GOP-503 "Cold Shutdown to Hot Standby" have been revised to add the RWSTs to the acceptance criteria for system operability and alignment verification.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME DOCKET NUMBER LER NUMBER PAGE NO.
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I. EVENT DESCRIPTION

1. Initial Conditions Prior to the Event

On September 21, 1991, Unit 3 was in Mode 4 (Hot Shutdown) heating up to enter Mode 3 (Hot Standby) and Unit 4 was defueled. The Unit 3 Refueling Water Storage Tank (RWST) had greater than 320,000 gallons of borated water and the Unit 4 RWST had 280,000 gallons of borated water.

Pre-startup alignment verifications aligned the Safety Injection (SI) System in accordance with procedure 3-OP-062, "Safety Injection." A system walkdown, in accordance with procedure 3-OSP-202.1, "Safety Injection /Residual Heat Removal Flowpath Verification," was performed on September 12 to verify system status and again on September 20 as part of procedure 3-GOP-503, "Cold Shutdown to Hot Standby." Minimum equipment checks were performed during each shift following entry into Mode 4.

2. The Event

On September 21, at 0340, contrary to the requirements of Technical Specification (TS) 3.0.4, Unit 3 entered Mode 3. At that time Unit 4's RWST had less than the 320,000 gallons of water required by TS 3/4.5.4 for an operable RWST. The Unit 4 Safety Injection (SI) Pumps' suction was aligned to the Unit 4 RWST. Therefore, both Unit 4 SI pumps were technically inoperable because they were not aligned to an operable flow path.

Action e. of TS 3.5.2 allows 72 hours to restore one of the Unit 4 SI pumps to operable status or be in Mode 3 in an additional 6 hours and Mode 4 within the following 6 hours. This condition was discovered on September 23, 1991, at 2340. The Unit 4 SI Pumps were made operable at 0100 on September 24, 1991, by opening the cross-connect valves allowing them to take suction from the Unit 3 RWST. Thus the Action requirements of TS 3.5.2 were met.

II. EVENT CAUSE

The root cause of this event was procedural inadequacies which did not require the system configuration to consider the RWSTs in the acceptance criteria for system operability.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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III. EVENT SAFETY ANALYSIS

Even though the Unit 4 SI pumps were considered to be technically inoperable (although fully functional, they were not capable of meeting the Technical Specification definition of operability), they were capable of supplying more borated water in an emergency than they would have been able to if they were taking suction from the Unit 3 RWST along with the Unit 3 SI pumps. The Unit 4 SI pumps were aligned to supply the Unit 3 Reactor Coolant System with 280,000 gallons of borated water and the Unit 3 SI pumps were aligned to supply the Unit 3 Reactor Coolant System with 320,000 gallons of borated water. The minimum TS requirement is for three SI pumps aligned to take suction from a minimum supply of 320,000 gallons of borated water. For this event, four fully functional SI pumps were aligned to take suction from 600,000 gallons of borated water and provide this borated water to the Unit 3 Reactor Coolant System. In addition, the two Unit 4 SI pumps were capable of being manually realigned to the Unit 3 RWST if needed.

Based on the above, the health and safety of the public were not adversely affected.

IV. CORRECTIVE ACTIONS

1. Immediate Corrective Actions

The Unit 4 SI pumps were realigned to take suction from the Unit 3 RWST on September 23, 1991. This restored both Unit 4 SI pumps to operability, thus exiting from the action requirement of TS 3.5.2.

2. Corrective Actions to Prevent Recurrence

Procedures 3/4-OP-062, "Safety Injection"; 3/4-OSP-201.1, "RCO Daily Logs"; 3/4-OSP-202.1, "Safety Injection/Residual Heat Removal Flowpath Verification"; and 3/4-GOP-503 "Cold Shutdown to Hot Standby" have been revised to add the RWSTs to the acceptance criteria for system operability and alignment verification.

V. ADDITIONAL INFORMATION

Not Applicable