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TOMONTO,R.J. Florida Power & Light Co.
PLUNKETT,T.F. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-002-00:on 920319,steam/feedwater flow mismatch bistables not tripped within 1 h action statement when steam flow testing in progress.Caused by personnel error.Procedure revised to add bistables.W/920420 ltr.

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L-92-111
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: 92-002
Date of Event: March 19, 1992
Failure to Trip Steam Flow/Feedwater Flow Mismatch Bistables

The attached Licensee Event Report 250-92-002 is provided pursuant to the requirements of 10 CFR 50.73 (2)(i)(B) to provide information on the subject event.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

TFP\RJT\rt

Attachment

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

IE22
1/1

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
TURKEY POINT UNIT 3	05000250	1 OF 3

TITLE (4) FAILURE TO TRIP STEAM/FEEDWATER FLOW MISMATCH BISTABLES

EVENT DATE (5)				LER NUMBER (6)			RPT DATE (7)				OTHER FACILITIES INV. (8)	
MON	DAY	YR		YR	SEQ #	R#	MON	DAY	YR		NAME	DOCKET # (S)
03	19	92		92	002	00	04	20	92			

OPERATING MODE (9)	1	10 CFR 50.73 (2) (i) (B)
POWER LEVEL (10) 87		(Specify in Abstract below and in text)

LICENSEE CONTACT FOR THIS LER (12)

R. J. Tomonto, Licensing Engineer	TELEPHONE NUMBER 305-246-7327

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)			EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES	(If yes, complete EXPECTED SUBMISSION DATE)	NO X				

ABSTRACT (16)

At approximately 1311 hours on March 19, 1992, with Turkey Point Unit 3 operating at 87 percent power and Turkey Point Unit 4 operating at 100 percent power, testing was being performed on the Unit 3 Steam Line High Flow Channels. Plant procedure 3-PMI-072.5, Turbine First Stage Pressure Protection Instrumentation Set IV Channel P-3-447, was in progress to test comparator setpoints for steam line high flow. The procedure required removal from service of the steam flow transmitter which also supplies input to Steam/Feedwater Flow Mismatch channels. Steam/Feedwater Flow Mismatch channels were not removed from service. At 1413 hours on March 19, 1992, testing on the Steam Line High Flow channels was stopped, and the steam flow channels were restored to service. The Reactor Control Operator later determined that the Steam/Feedwater Flow Mismatch channels had not been removed from service at the same time as the steam flow channels.

Technical Specification 3/4.3.1, Reactor Trip System Instrumentation, was violated, since the Steam/Feedwater Flow Mismatch bistables had not been tripped within the 1 hour ACTION STATEMENT while steam flow testing was in progress.

I. DESCRIPTION OF THE EVENT

At approximately 1311 on March 19, 1992, with Turkey Point Unit 3 operating at 87 percent power and Turkey Point Unit 4 operating at 100 percent power, testing was being performed on the Unit 3 Steam Line High Flow Channels. Plant procedure 3-PMI-072.5, Turbine First Stage Pressure Protection Instrumentation Set IV Channel P-3-447, was in progress to test comparator setpoints for steam line high flow. The procedure required removal from service of the steam flow transmitter which also supplies input to the Steam/Feedwater Flow Mismatch channels. Steam/Feedwater Flow Mismatch channels were not removed from service. At 1413 hours on March 19, 1992, testing on the Steam Line High Flow channels was stopped, and the steam flow channels were restored to service. When testing resumed at approximately 1800 hours on March 19, 1992, the Reactor Control Operator determined that the Steam/Feedwater Flow Mismatch channels had not been removed from service at the same time as the Steam flow channels. As a result, the Nuclear Plant Supervisor directed the Instrument and Control (I&C) supervisor to discontinue testing and return the equipment to normal. The I&C Field Supervisor informed the Nuclear Plant Supervisor that the procedure was complete. The Steam Flow channels were immediately returned to service.

At 2030 hours on March 19, 1992, an investigation concluded that during testing between 1311 hours and 1413 hours, Unit 3 did not meet the requirements of Technical Specification 3/4.3.1.

Technical Specification Table 3.3-1, Reactor Trip System Instrumentation, ACTION STATEMENT 6, states the following:

> With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed until performance of the next required ANALOG CHANNEL OPERATIONAL TEST provided the inoperable channel is placed in the tripped condition within 1 hour.

Technical Specification 3/4.3.1 was violated, since the Steam/Feedwater Flow Mismatch bistables had not been tripped within the 1 hour time restriction, while steam flow testing was in progress. The actual elapsed time was 1 hour, two minutes.

II. CAUSE OF THE EVENT

The cause of this event is personnel error during the review of the procedure. Technical Specification 3.3.1 and Table 3.3-1 item 12 requires that when the Steam Line Flow protection channels are removed from service when the unit is in Modes 1 or 2, bistables from Steam/Feedwater Flow Mismatch protection channels must be placed in the tripped condition within one hour. Contrary to this requirement, plant procedure 3-PMI-072.5, Turbine First Stage Pressure Protection

Instrumentation Set IV Channel P-3-447, only required the First Stage Pressure Channel P-447 and Steam Line High Flow Channels F-475, F-485, and F-495 be removed from service by placing the respective bistables in the tripped condition.

III. ANALYSIS OF THE EVENT

The reason for this discrepancy is that the original plant procedure for testing the Steam Line High Flow channels was specifically intended to be performed during refueling (Mode 6) and thus only specified that the bistables for the Steam Line High Flow protection be tripped. When this procedure was upgraded to a new format on October 8, 1987, only those bistables previously designated to be tripped were included in the new procedure, even though the new procedure is applicable in all operating modes. Since 1977, the procedure (or portions of the procedure) that govern this activity have only been performed during refueling.

IV. CORRECTIVE ACTIONS

1. Procedures 3-PMI-072.5 and 3-PMI-072.4 were revised to add bistables for the Steam/Feedwater Flow Mismatch protection function and annunciators to the removal of the Steam Flow channel from service.

2. All infrequently scheduled load threatening Instrument and Control (I&C) surveillance and calibration procedures were reviewed and found consistent with Technical Specification Surveillance Requirements.

3. All load threatening I&C surveillance and calibration procedures will be modified to include review and written acknowledgement by the Reactor Control Operator of channels to be removed from service, and annunciators and status lights expected. These procedural modifications will be completed by 7/31/92. In the interim, I&C will include an Operations Briefing Checksheet with each Plant Work Order issued for infrequently scheduled load threatening maintenance activities.

V. ADDITIONAL INFORMATION

No similar LERs have been identified.