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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light Co 05000250
 AUTH. NAME AUTHOR AFFILIATION
 HANEK, O.I. Florida Power & Light Co.
 PLUNKETT, T.F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-003-01: on 920323, identified improper pressure transmitter calibration. Caused by inadequate procedures. Transmitters locations will be checked & calibration procedures will be revised. W/920601 ltr.

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JUN 1 1992

L-92-163
10 CFR 50.73

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

Gentlemen:

Re: Turkey Point Unit 3 and 4
Docket Nos. 50-250 and 50-251
Reportable Event: 92-003-01
Date of Event: March 23, 1992
Operation With Improper Pressure
Transmitter Calibration

The attached Supplement 1 to Licensee Event Report 250/92-003-00 is being provided, pursuant to the requirements of 10 CFR 50.73 to present the results of further review of the event.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

TFP/OIH

Attachment

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

1500.0

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) TURKEY POINT UNITS 3 AND 4	DOCKET NUMBER (2) 05000250	PAGE (3) 1	OF 4
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TITLE (4) **Operation With Improper Pressure Transmitter Calibration**

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)
03	23	92	92	003	01	06	01	92	Turkey Point Unit 4		05000251

OPERATING MODE (9)	1/1	<u>10 CFR 50.73(a)(2)(i)</u>
POWER LEVEL (10)	87/100	

LICENSEE CONTACT FOR THIS LER (12)

Olga I. Hanek, Licensing Engineer	TELEPHONE NUMBER
	305-246-6607

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	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
(if yes, complete EXPECTED SUBMISSION DATE)				

ABSTRACT (16)

In response to NRC Information Notice 91-75, "Static Head Corrections Not Included in Pressure Transmitter Calibration Procedures", issued by the NRC on November 25, 1991, a review of the Turkey Point Units 3 and 4 calibration procedures revealed that the static head correction was not considered in some pressure transmitter calibration procedures. IN 91-75 also reported that several plants did not include the static pressure span effects in the differential pressure transmitter calibration procedures. A review of the Turkey Point Units 3 and 4 calibration procedures revealed that the static pressure span effects had been included in the calibration procedures. However, an error was found in the calibration procedures for steam generator level where the static pressure span effect was not applied properly. On March 23, 1992, FPL concluded that, after including the static head correction, and correcting the static pressure span effect error, Turkey Point Units 3 and 4 are operating in accordance with the current Technical Specifications.

However, without inclusion of static head corrections in some pressure transmitter calibration procedures and after correcting the static pressure span effect error found, operations were not in accordance with the old Technical Specifications in effect prior to August 26, 1991. FPL performed an engineering analysis and determined that after inclusion of static head corrections, correcting the static pressure span effect error, and assuming worst case instrument uncertainties, all the setpoints in question were within the design basis of the plant during operation prior to August 26, 1991.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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I. EVENT DESCRIPTION

NRC Information Notice 91-75, "Static Head Corrections Not Included in Pressure Transmitter Calibration Procedures", issued by the NRC on November 25, 1991, reported that several plants did not include the static head corrections in their pressure transmitter calibration procedures. A review of the Turkey Point Units 3 and 4 calibration procedures revealed that the static head correction was not included in the calibration procedures. IN 91-75 also reported that several plants did not include the static pressure span effects in the differential pressure transmitter calibration procedures. A review of the Turkey Point Units 3 and 4 calibration procedures revealed that the static pressure span effects had been included in the calibration procedures. However, an error was found in the calibration procedures for steam generator level where the static pressure span effect was not applied properly. The impact resulting from not incorporating the static head correction in the pressure transmitter calibration procedures and the static pressure span effect error for Safety Related applications was evaluated for the following Technical Specification setpoints:

1. High pressurizer pressure reactor trip
2. Low pressurizer pressure reactor trip
3. Pressurizer high water level reactor trip
4. Steam generator low-low water level reactor trip
5. Pressurizer pressure input to overtemperature delta-T reactor trip
6. Steam/feedwater flow mismatch coincident with steam generator low water level reactor trip
7. Low pressurizer pressure safety injection actuation setpoint
8. High steam line flow coincident with low steam generator pressure safety injection actuation setpoint
9. High differential pressure between steam line header and any steam line safety injection actuation setpoint

The calculated static head correction factors are as follows:
 Steam header pressure - 3.5 psi (minimum)
 Steam generator pressure (Main steam line pressure) - 4.4 psi (maximum)
 Pressurizer pressure - 14.5 psi (maximum)

On March 23, 1992, FPL concluded the evaluation of the above setpoints including the static head and pressure span corrections in the existing transmitter calibration procedures. For the worst case pressurizer pressure and steam generator pressure transmitter trip setpoints, the corrected values remain within the current Technical Specification values and therefore are in compliance with the present Technical Specifications and Safety Analysis Limits.

For Technical Specification 3/4.2.5, DNB Parameters, Item b. pressurizer pressure, the potential existed for the minimum operational pressure value to be violated under system perturbations. However, the automatic pressure control system would restore system pressure within the allowed action time. Therefore there is no adverse effect on safety.

For the original Technical Specifications prior to Amendments 137 and 132 (i.e., prior to August 26, 1991) for Units 3 and 4 respectively for the above setpoints, after inclusion of static head



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corrections, static pressure span correction, and assuming worst case instrument uncertainties, the following Technical Specifications setpoints were violated:

1. Technical Specification 2.3, Limiting Safety System Settings, Protective Instrumentation Setpoints:
 - Pressurizer: Low pressurizer pressure reactor trip
 - Steam Generator: Low-low water level
 - Overtemperature delta-T reactor trip
2. Technical Specification 3.5, Instrumentation, Table 3.5-4, Engineered Safety Feature Setpoints:
 - Item 3. Pressurizer Low Pressure Safety Injection Actuation Setpoint
 - Item 4. High Steam Line Differential Pressure Safety Injection Actuation Setpoint
 - Item 5. High Steam Line Flow Coincident with Low Steam Line Pressure Safety Injection Actuation Setpoint

For Technical Specification 3.1.6, Reactor Coolant System, DNB Parameters, Item b. pressurizer pressure, the potential existed for the minimum operational pressure value to be violated under system perturbations. However, the automatic pressure control system would restore system pressure within the allowed action time. Therefore there is no adverse effect on safety.

FPL performed an engineering analysis and determined that after inclusion of static head corrections, correction of the static pressure span effect error, and assuming worst case instrument uncertainties, all the setpoints in question were within the design basis of the plant during operation prior to August 26, 1991.

II. EVENT CAUSE

The cause of the event is attributed to inadequate procedures. The static head corrections had not been incorporated into the calibration procedures for these pressure transmitters. The static pressure span effects were erroneously applied for the steam generator low-low water level setpoint.

III. EVENT SAFETY ANALYSIS

On March 23, 1992, FPL concluded that, after inclusion of the static head correction, correction of the static pressure span error, and assuming worst case instrument uncertainties, Turkey Point Units 3 and 4 are operating in accordance with the current Technical Specifications.

FPL reviewed the old Technical Specifications and the calibration procedures in effect prior to the Technical Specification revision which incorporated the new setpoint methodology. FPL determined that, after applying the static head correction factors to the setpoints, and correcting the static pressure span effect error, there is still adequate margin to the Safety Analysis Limit which existed for the setpoints discussed in Section I. Therefore, there was no operability concern or safety concern with the operation of the Turkey Point Units 3 and 4 without the pressure transmitter static head correction factors incorporated and the static pressure span effect error in the pressurizer pressure and steam generator pressure and level procedures.

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IV. CORRECTIVE ACTIONS

Although inclusion of the static head correction factor and correction of the static pressure span effect for the pressure transmitters is not a violation of the current Turkey Point Units 3 and 4 Technical Specifications (Amendments 137 and 132), applicable plant pressure transmitters locations will be checked and the calibration procedures will be revised (as needed) to include the static head correction factor and correct the pressure span effect error. This work will be completed by the end of the next refueling outages currently scheduled for October 26, 1992 for Turkey Point Unit 3, and June 13, 1993 for Turkey Point Unit 4.

V. ADDITIONAL INFORMATION

No similar events involving pressurizer pressure transmitter static head corrections have been reported for Turkey Point.

This event was reported in accordance with 10 CFR 50.73
(a) (2) (i) (B).