



Crystal River Unit 3 Docket No. 50-302

October 12, 1990

3F1090-09

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

Subject: Licensee Event Report (LER) 88-007-01

References: FPC to NRC 4/6/88 - LER 88-007 FPC to NRC 3/28/90 - Supplement Extension

Dear Sir:

Enclosed is a supplement to Licensee Event Report (LER) 88-007 which was previously submitted in accordance with 10 CFR 50.73. This supplement represents the results of the inspection and investigation described in LER 88-007.

Sincerely,

G. L. Boldt Vice President Nuclear Production

WLR:mag

Enclosure

xc: Regional Administrator, Region II Senior Resident Inspector

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EVENT DESCRIPTION

As a result of the reevaluation of the emergency diesel generator [EK, DG] loading issue, additional pump flow testing was conducted to determine the actual KW load of major engineered safeguards pumps. During the NRC inspection period of January 11 to January 15, 1988, (NRC inspection report 50-302/88-05) the inspector was reviewing some of the above test data and noted a discrepancy between the manufacturer's pump curve (head-flow) and the test data. This issue was being tracked by Unresolved Item Number 88-05-01. Unresolved Item 88-05-01 was later closed and tracked by violation 89-30-01. The violation response has been submitted, and the package is waiting to be closed.

On January 27, 1988, a Nonconforming Operations Report (NCOR 88-28) was generated to document the apparent low discharge head of the 'A' train Building Spray Pump (BSP-1A), [BE, P]. The initial action was to obtain more accurate test data to evaluate the new data and determine its affect upon the operability of BSP-1A. The reportability of the event was deferred pending the results of engineering evaluation.

In a letter to the NRC dated February 1, 1988, Crystal River Unit 3 (CR-3) responded to a request for additional information regarding emergency diesel generator loading. In response to question number 12, CR-3 stated the applicable surveillance procedure had been re-run and the results confirmed the previous test results (the discrepancy remained). At that time it was thought the location/orientation of the installed instrumentation might not be giving a true indication of the total head developed by the pump. Different instrumentation was installed to more directly measure the pump discharge and suction pressures during subsequent testing conducted on February 11, 1988.

On February 24, 1988 Nuclear Operations Engineering issued a letter summarizing their evaluation based upon the final test data; their engineering calculations show that BSP-1A will provide a flow of 1460 gpm at a head of 375 feet which is below its design rating of 1500 gpm. A further review determined the design rating was part of the design basis. The original analysis and calculations did not specifically identify a minimum flow rate for the Building Spray system. Therefore on March 7, 1988 the event was determined to be reportable in accordance with 50.73.(a)(2)(ii)(B).

CAUSE

During the 1990 refueling outage the pump was disassembled for inspection. The vendor was consulted about the impeller, and it was discovered that a final manufacturing step had been omitted in the preparation of the impeller installed in BSP-1A. After the original impeller is fabricated, it is given a final performance test. At this point in manufacture, a procedure called "vane tipping" was required to provide the head-flow characteristics specified. This

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was done to the original impeller, but was not documented in the engineering bill of materials. When FPC ordered a replacement impeller, it was made to the engineering bill of materials. The vane tipping process was not included in the specifications, and was therefore not performed on the replacement impeller. This was the cause of the low flow operating conditions observed.

SAFETY CONSIDERATIONS

Even though 1460 gpm is below the original design requirement of 1500 gpm, subsequent calculations have shown a minimum flow rate of 1200 gpm will satisfy all design requirements for containment pressure, iodine removal, pH control and equipment qualifications.

A building spray flow rate of 1200 gpm does impact post-accident containment pressure, iodine removal, and equipment qualification in a non-conservative manner. However, the impact is small and is within the bounds of existing analyses. As such, the establishment of a minimum building spray flow of 1200 gpm represents a reduction in over-design rather than a reduction in the margin of safety.

CORRECTIVE ACTION

The impeller was returned to the manufacturer for repair and was later reinstalled. The vane tipping instructions have been added to the bill of material and the impeller part number callout on that file has been annotated to reference the specific shop change order involved. This corrective action by the vendor was reviewed by FPC Quality Assurance and found to be acceptable. The review of head flow surveillance data for other engineered safeguards pumps is underway.

PREVIOUS SIMILAR EVENTS

A review of previous LERs indicates this is the first event in which an engineered safeguards pump has been reported as operating below its design capacity.