

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) CRYSTAL RIVER UNIT 3	DOCKET NUMBER (2) 0 5 0 0 0 3 0 2	PAGE (3) 1 OF 0 4
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TITLE (4)
ENGINEERED SAFEGUARDS SURVEILLANCE INADEQUACIES

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 6	1 3	8 4	8 4	0 1	3	0 7	1 3	8 4	N/A	0 5 0 0 0
									N/A	0 5 0 0 0

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)				
POWER LEVEL (10) 1 0 0	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(e)	<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(e)	
	<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 50.36(e)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 365A)	
	<input type="checkbox"/> 20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)		
	<input type="checkbox"/> 20.406(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(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 W. K. Bandhauer, Nuclear Safety Supervisor	TELEPHONE NUMBER
	AREA CODE: 9 0 4 7 1 9 5 - 6 4 8 1 6

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS

SUPPLEMENTAL REPORT EXPECTED (14)

<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH DAY YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On June 13, 1984, Crystal River Unit 3 performed a detailed comparison of the Technical Specification Surveillance requirements versus procedure implementation for the Engineered Safeguards Systems. Three discrepancies were found during this review: (1) Failure to test a portion of the start circuitry of one of three High Pressure Injection Pumps; (2) Failure to document the testing of alarms; and (3) Failure to separately document the response time of Diverse Containment Isolation.

The operability of the affected High Pressure Injection Pump and Diverse Containment Isolation was immediately verified through testing. Plant surveillance procedures will be modified to assure the required testing of the Engineered Safeguards Systems is performed.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

EVENT DESCRIPTION

On June 13, 1984, an in-plant review of the adequacy of plant Surveillance Procedures to ensure conformance with the requirements of the Engineered Safeguards (E.S.)(JE) Technical Specifications (T.S.) was performed. Three discrepancies found were determined to be of sufficient significance to warrant reporting.

1. T.S. 3.5.2 requires the operability of two independent Emergency Core Cooling Systems. Crystal River 3 (CR-3) High Pressure Injection (HPI) System (BQ) has three pumps (BQ,P) of which two are selected for E.S. (normally MUP-1A and MUP-1C) and the third is used for normal makeup (normally MUP-1B). In the event one of the E.S. selected pumps becomes inoperable, the normal duty pump (MUP-1B) is then selected for E.S. duty to satisfy T.S. requirements. A review of plant procedures revealed a small portion of the pump start circuitry associated with MUP-1B was not being tested; therefore MUP-1B had not been E.S. qualified (see attached page for description of circuitry not tested). A review of operating logs revealed that MUP-1B had been selected for E.S. duty numerous times while either MUP-1A or MUP-1C was removed from service for repairs.

Operation with only one operable HPI train in Modes 1, 2, or 3 for greater than 72 hours is not allowed by T.S. 3.5.2. One example of unknowingly exceeding the allowable 72 hours occurred from 07/22/83 through 11/14/83 when CR-3 took credit for MUP-1B which had not been fully qualified for E.S. operation. Subsequent testing showed that this pump (MUP-1B) would have functioned if required and would have met the necessary E.S. qualifications. Hence, the plant operated within the assumptions of the Final Safety Analysis Report (FSAR) (Section 14.2.2.5.2).

2. T.S. 3.3.2.1 requires certain E.S. Actuation System instrumentation to be operable. The T.S. Surveillance to demonstrate this operability includes a periodic CHANNEL FUNCTIONAL TEST which among other requirements is defined to encompass the testing of "alarm and/or trip functions" associated with the instrumentation. Plant surveillance procedures did not always require alarm testing to be documented. Trip function testing was determined to be adequate.

Plant Emergency Procedures use alarms as one of the entry conditions (although other plant indications are also used) and it is judged that certain alarms should be included in the normal surveillance of this instrumentation. However, the FSAR does not take credit for the alarm portion of the instrumentation. Hence, the exclusion of the alarms from the surveillance procedures is not considered to create a safety concern.

3. T.S. 3.3.2.1 requires response time testing of E.S. systems. A review of plant procedures revealed that the time response testing of Diverse Containment Isolation was not properly documented in plant surveillance procedures. The necessary time responses needed to calculate the total Diverse Containment Isolation response were obtained, but the times were not compared to T.S. acceptance criteria.

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

Past surveillance data was examined and the response times were found to be within the allowed acceptance criteria.

The performance of time response testing is required every 18 months. Since response times were within the T.S. acceptance criteria, this event is judged not to be a safety concern.

CORRECTIVE ACTION

Testing was immediately performed on MUP-1B to ensure E.S. qualification. Time response testing was also performed on the Diverse Containment Isolation relays (JM, RLY). A review of previous testing of the Diverse Containment Isolation revealed previous response times to be acceptable. Plant procedures will be revised to ensure that the required testing of the Engineered Safeguards System is performed.

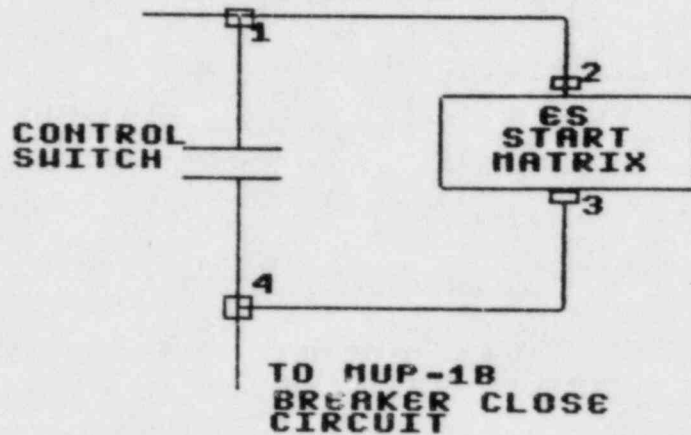
PREVIOUS SIMILAR EVENTS

This is the second occurrence of inadequate surveillance testing of the Engineered Safeguards System.

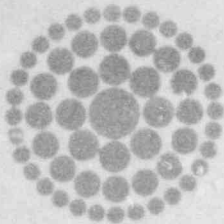
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TEXT (If more space is required, use additional NRC Form 388A's) (17)



The above drawing is a simplified schematic of the start circuitry for MUP-1B. It was discovered during a review of plant surveillance procedures that continuity was not being verified for the wiring leading into the ES START MATRIX (point 1 to point 2) and for the wiring leading out of the ES START MATRIX (point 3 to point 4). The proper operation of the matrix as well as the ability to start the pump using the control switch had been demonstrated. Upon discovery of this procedural inadequacy the continuity into and out of the START MATRIX was verified.



**Florida
Power**
CORPORATION

July 13, 1984
3F0784-10

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Licensee Event Report No. 84-013-00

Dear Sir:

Enclosed is Licensee Event Report (LER) No. 84-013-00 which is submitted in accordance with 10 CFR 50.73.

Should there be any questions, please contact this office.

Sincerely,

G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

AEF/feb

Enclosure

cc: Mr. James P. O'Reilly
Regional Administrator, Region II
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
161 Marietta Street N.W., Suite 2900
Atlanta, GA 30323

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