

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 3
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TITLE (4)  
Post Accident Sampling System Manual Isolation Valves Found Closed

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 2	2 8	8 4	8 4	0 0 4	0 1	0 8	0 9	8 4	N/A			0 5 0 0 0		
									N/A			0 5 0 0 0		

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

OPERATING MODE (8) 1	20.402(b)	20.406(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10) 0 7 6	20.406(a)(1)(i)	50.36(e)(1)	50.73(a)(2)(v)	73.71(e)
	20.406(a)(1)(ii)	50.36(e)(2)	50.73(a)(2)(vii)	<input checked="" type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.406(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)		
20.406(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)		
20.406(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)		

Voluntary Report

LICENSEE CONTACT FOR THIS LER (12)

NAME K. R. Wilson, Supervisor, Site Nuclear Licensing	TELEPHONE NUMBER
	AREA CODE 9 0 4      7 9 5 - 3 8 0 2

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

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 February 28, 1984, while conducting a post-installation engineering review of the Post-Accident Sampling System (PASS), utility personnel discovered that six manual isolation valves were closed, thereby reducing the system's capability to perform as designed. Florida Power Corporation had declared the PASS operable on January 1, 1984. The sampling capacity of the Reactor Coolant System was available through the normal letdown and pressurizer primary sampling flowpaths. The radiological consequences of such sampling were evaluated and found to be insignificant.

Personnel error and inadequacies in the Modification Approval Record (MAR) process are the causes of the event. All six valves were opened. Procedures and the MAR process will also be revised to prevent recurrence. This is a voluntary report.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		0 0 4	0 1	0 1	0 2	OF	0 3

TEXT (If more space is required, use additional NRC Form 368A's) (17)

IDENTIFICATION OF EVENT

In compliance with NUREG-0737 and the associated confirmation order, the Post-Accident Sampling System (PASS) was declared operable on January 1, 1984. On February 28, 1984<sup>1</sup>, while utility personnel were conducting a post-installation engineering review, it was discovered that the following manual isolation valves were closed:

- RCV-34 (AB, ISV, "A", RCS Cold Leg Sample Isolation Valve)
- RCV-35 (AB, ISV, "A" RCS Cold Leg Sample Isolation Valve)
- RCV-48 (AB, ISV, "C" RCS Cold Leg Sample Isolation Valve)
- RCV-144 (AB, ISV, "C" RCS Cold Leg Sample Isolation Valve)
- CAV-472 (IP, ISV, RB Sump Return Line Isolation Valve)
- CAV-502 (IP, ISV, Sample Return Line Isolation Valve)

For the PASS to be configured as designed, these valves are required to be open. Consequently, the PASS was not able to perform all its functions in the manner designed. However, all NUREG-0737 required samples could be taken within the required time frames.

ANALYSIS OF EVENT

The sampling capacity of the Reactor Coolant System<sup>2</sup> (RCS) was available through the normal letdown and pressurizer primary sampling flowpaths. The radiological consequences of sampling the RCS and not returning reactor coolant to the reactor building sump through the direct path were evaluated and found to be insignificant.

CAUSE OF THE EVENT

Both personnel error and inadequacies in the Modification Approval Record (MAR) process contributed to this event. In the development of the PASS MAR, personnel failed to adequately address two procedures (OP-301, Filling and Venting the RC System; and OP-403, Chemical Addition System) that required revisions as a result of the addition of the PASS to the plant. OP-301 required RCV-34, -35, -48 and -144 to be closed. Thus, in July 1983, in accordance with procedure OP-301, these valves were closed prior to filling the RCS following refueling. CAV-472 and -502 should have been incorporated into OP-403 but were not. CAV-472 and -502 were left shut during testing following the installation of PASS. All of the valves should have been reopened prior to system utilization in the "emergency mode".

The MAR process apparently failed to provide an adequate mechanism to identify all procedures affected by this plant modification.

- 1 76% Rated Thermal Power, Mode 1
- 2 AB

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		8 4	- 0 0 4	- 0 1	0 3	OF	0 3

TEXT (If more space is required, use additional NRC Form 368A's) (17)

CORRECTIVE ACTION

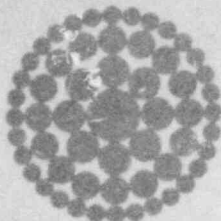
1. All six manual isolation valves (RCV-34, -35, -48, -144 and CAV-472, -502) were opened.
2. OP-301 will be revised to leave RCV-34, -39, -48 and -144 open.
3. OP-403 will be revised to include CAV-472 and -502 and to leave these valves open.
4. A more effective method of system turnover in the MAR process will be devised to ensure that all necessary system documentation (procedures, valve check lists, etc.) are in place prior to responsibility for the system being transferred to operations and maintenance. This is part of a long-term program initiated by FPC to upgrade the MAR process and is a subject of general discussion between NRC/ONRR and the OL licensees.

PREVIOUS SIMILAR EVENTS

None.

REPORTABILITY

Voluntary Report.



**Florida  
Power**  
CORPORATION

August 8, 1984  
3F0884-04

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. 84-004-01

Dear Sir:

Florida Power Corporation hereby supplements the subject Licensee Event Report (LER). LER No. 84-004-00 stated that a supplemental report would be issued.

Should there be any questions, please contact this office.

Sincerely,

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

RHT/feb

Enclosure

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

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