

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-02

December 7, 1995
3F1295-04

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20545

Subject: Licensee Event Report (LER) 95-026-00

Dear Sir:

Please find the enclosed Licensee Event Report (LER) 95-026-00. This report is submitted by Florida Power Corporation in accordance with 10 CFR 50.73. A supplement to this report will be provided by January 31, 1996.

Sincerely,

B. J. Hickle, Director
Nuclear Plant Operations

TWC:ff

Attachment

xc: Regional Administrator, Region II
Project Manager, NRR
Senior Resident Inspector

110126

JE221

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HOURS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON DC 20503.

FACILITY NAME (1)

CRYSTAL RIVER UNIT 3 (CR-3)

DOCKET NUMBER (2)

0 5 0 0 0 3 0 2 1 OF 0 8

PAGE (3)

TITLE (4)

Unqualified Flow Instrument Used in Determining HPI Pump Runout Conditions Caused by Failure to Recognize Applicability of Reg Guide 1.97

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)
1	1	0 7 9 5	9 5	0 2 6	0 0	1	2	0 7 9 5	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	20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)
				20.405(a)(1)(i)		50.38(c)(1)	X	50.73(a)(2)(v)		73.71(c)
				20.405(a)(1)(ii)		50.38(c)(2)		50.73(a)(2)(vii)		OTHER (Specify in Abstract below and in Text, NRC Form 366A)
				20.405(a)(1)(iii)		50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		
				20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)		
			20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)			

LICENSEE CONTACT FOR THIS LER (12)

NAME	T.W. Catchpole, Sr. Nuclear Licensing Engineer			TELEPHONE NUMBER	3 5 2 5 6 3 - 4 6 0 1		
				AREA CODE			

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

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

SUPPLEMENTAL REPORT EXPECTED (14)

<input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	0	1	3	1	9	6
---	-----------------------------	-------------------------------	---	---	---	---	---	---

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On November 7, 1995, Florida Power Corporation's Crystal River Unit 3 was in MODE ONE (POWER OPERATION), operating at 100% reactor power and generating 882 megawatts. During a review of Emergency Operating Procedure (EOP) setpoints engineering personnel determined that operators used an unqualified reactor coolant pump (RCP) seal injection flow instrument to aid in preventing High Pressure Injection (HPI) pump runout conditions. The HPI flow to the RCP seals was noted as being in addition to the HPI flow measured by Reg Guide 1.97-qualified instrumentation and did not appear at the time of the discovery of this event, to have been considered in hydraulic analyses for the HPI pumps with respect to possible runout conditions. Subsequent to the reporting of this event, hydraulic analyses were located which included consideration of RCP seal injection flow. Additional evaluation is being performed to determine if HPI pump runout can be achieved in the existing system configuration. The cause of this event was failure to recognize the need to update Reg Guide 1.97 Type A Variable reviews as changes were made to EOPs. A new commitment has been established to ensure these reviews will be accomplished in the future. Additional corrective actions will be based on the results of hydraulic analysis at reactor coolant pressures not previously evaluated, but necessary to meet HPI termination criteria.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HOURS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON DC 20503.

FACILITY NAME (1) CRYSTAL RIVER UNIT 3 (CR-3)	DOCKET NUMBER (2) 0 5 0 0 0 3 1	LER NUMBER (6) <table border="1"> <tr> <th>AR</th> <th>SEQUENTIAL NUMBER</th> <th>REVISION NUMBER</th> </tr> <tr> <td>9</td> <td>5</td> <td>0</td> </tr> </table>	AR	SEQUENTIAL NUMBER	REVISION NUMBER	9	5	0	PAGE (3) 0 2 OF 0 8
AR	SEQUENTIAL NUMBER	REVISION NUMBER							
9	5	0							

TEXT (If more space is required, Use additional NRC Form 386A's (17))

EVENT DESCRIPTION

On November 7, 1995, Florida Power Corporation's (FPC) Crystal River Unit 3 (CR-3) was in MODE ONE (POWER OPERATION), operating at 100% Reactor Power and generating 882 megawatts. During a review of Emergency Operating Procedure (EOP) setpoints under the EOP Enhancement Program - Phase 2, FPC Engineering personnel discovered a discrepancy regarding FPC's commitments to Regulatory Guide (R.G.) 1.97 "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident". The EOP Enhancement Program was developed as a result of NRC Inspection 93-16 and a variety of self-identified weaknesses. It is an effort to reconstitute the bases for the guidelines contained in the EOPs. In this event, engineering personnel noted that operators must rely on a non-safety, non-qualified flow indicator [CB,FI] (MU-27-FI) to measure high pressure injection [BQ](HPI) flow through Reactor Coolant (RC) Pump [AB,P] seal injection lines and to ensure HPI flow is within the runout capacity of the HPI pumps. The flow measured by MU-27-FI is in addition to the flow measured by qualified instrumentation in the HPI lines and, at the time of the discovery of this event, did not appear to have been considered in makeup system hydraulic analyses. It was further identified that total HPI pump flow is limited in the EOPs to 540 gallons per minute (gpm) per running pump. Adding instrument error of 34 gpm yields a total HPI flow of 574 gpm which is just below the established HPI pump runout limit of 575 gpm. As a result, it was determined that, when operators are called upon to throttle HPI flow per EOP-13 "EOP Rules", the lack of qualification of the RC pump seal injection flow measurement during post accident conditions could result in Makeup Pump [CB,P] runout flow being exceeded.

A Problem Report was issued on November 7, 1995 to identify the failure to classify MU-27-FI as a R.G. 1.97 Type A, Category 1 instrument (these terms are defined in Attachment 1). The Problem Report was initially determined to be not reportable; however, an operability assessment was conducted in accordance with Compliance Procedure CP-150, "Identifying and Processing Operability Concerns." This procedure provides a structured approach toward determining the OPERABILITY of plant components required for accident mitigation and safe shutdown of the plant and provides guidelines to ensure no loss of plant system or component safety function. The assessment resulted in the determination that the HPI system was "operable but degraded" and a Justification for Continued Operation (JCO) was developed which involved the issuance of Short Term Instruction 95-0081. The instruction modifies the guidance in EOP-13 and requires operators to isolate the seal injection lines whenever HPI is required, thereby removing the non-qualified device from being used by operators in assessing total HPI flow during accident scenarios. An Event Notification was made to NRC at 1343 on 11/10/95 using the Non-Emergency Event Notification system in accordance with 10CFR72(b)(2)(iii)(D). Event Number 29582 was assigned.

EXPIRES 6/31/96

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HOURS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON DC 20503.

FACILITY NAME (1) CRYSTAL RIVER UNIT 3 (CR-3)	DOCKET NUMBER (2)		LER NUMBER (8)			PAGE (3)													
	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER																
				0	5		0	0	0	3	0	2	9	5	0	2	6	0	0

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

This report is being submitted in accordance with 10CFR50.73(a)(2)(v)(D) as a condition that could have prevented the fulfillment of the safety function to mitigate the consequences of an accident.

EVENT EVALUATION

During normal reactor operation, the Makeup and Purification System [CB] (MU) recirculates reactor coolant [AB] for purification and for supply of seal water to the Reactor Coolant Pumps (RCPs). The high pressure injection [BQ] (HPI) function of the MU System provides emergency core cooling to prevent uncovering the core during RC System small break loss-of-coolant-accidents (SBLOCA). Final Safety Analysis Report (FSAR) Section 6.1.3 states that two HPI pumps are normally actuated upon receipt of an Engineered Safeguards [JF] (ES) initiation signal. Each pump has its discharge throttled to deliver approximately 500 gpm when the RCS is at 600 psig. The safety analysis in Chapter 14 of the FSAR has shown that one HPI pump is sufficient to prevent core damage for those smaller leak sizes which do not allow the RCS pressure to decrease rapidly to the point at which Low Pressure Injection [BP] (LPI) is initiated.

HPI will automatically actuate on an RCS pressure of 1500 psig, and on a Reactor Building Isolation and Cooling [JM] (RBIC) Actuation of 4 psig in the containment [NH]. Automatic actuation of the valves and pumps by the actuation signals switches the system from its normal operating mode (MU) to the emergency operating mode (HPI) to deliver borated water into the reactor vessel [RPV] through the reactor coolant cold leg piping. See Figure 1.

Emergency Operating Procedure EOP-13 states that, in addition to protecting Nil Ductility Temperature (NDT) limits due to the possibility of vessel failure by brittle fracture, HPI must also be throttled to prevent pump runout. Step 2 of EOP-13 Rule #2 "HPI Control" instructs the operators to throttle HPI flow to 540 gpm per running pump to prevent pump runout. CR-3 has three MU Pumps (MUP-1A,1B,1C), two of which are required for HPI. The design basis for these pumps is based on vendor correspondence and actual test data and states that the maximum allowable flow through each pump is 575 gpm without instrument error correction.

HPI injection valves [BQ,FCV] MUV-23, 24, 25, & 26 are normally closed and receive an open command when HPI is actuated. When open, these valves direct the discharge of the MU pumps into the RCS cold legs at a point between the RCPs and the Reactor Vessel. To ensure adequate HPI flow in the event of a nozzle line break on one of the four HPI injection nozzles, the operator must monitor and balance HPI flow through the injection lines. Indication of HPI flow is provided to the operator via flow indicators [BQ,FI] MU-23-F11, F12, F13, and F14.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HOURS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT, (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON DC 20503.

FACILITY NAME (1) CRYSTAL RIVER UNIT 3 (CR-3)	DOCKET NUMBER (2)		LER NUMBER (6)			PAGE (3)
	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
	0 5 0 0 0 3 0 2	9 5	0 2 6	0 0	0 4	OF 0 8

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

Each RCP seal package receives 8 to 10 gpm injection flow during normal operation. Of this flow, all but approximately one gpm flows into the RCS along the pump shaft. The remaining one gpm flows up along the shaft seals to stage, cool, and lubricate them. This one gpm flow from each pump is routed to a common return line and along with the recirculation flow from the makeup pump, flows through one of the two seal return coolers and back to the Makeup Tank [CB,TK] (MUT). Flow Indicator MU-27-FI provides indication to the operators of reactor coolant total seal flow. The indication alerts the operator of abnormal flow conditions indicating potential seal failure, valve closures, or line breaks.

Prior to 1989, HPI balancing was not considered necessary for a HPI line break because the distance between the last check valve in the HPI line before injection into the RCS was small. Reconsideration of that criteria in 1989 led to the incorporation of HPI balancing and throttling as a Type A variable action and an analysis of HPI flow requirements for the HPI line break scenario. FPC's analysis is based on a detailed Babcock & Wilcox (B&W) calculation which assumes that RCP Seal Injection flow is open during the HPI line break, but does not take credit for the flow as a conservative assumption. The focus of the analysis and calculation was on minimum HPI flow requirements for design basis scenarios, not potential pump runout concerns.

Subsequent to the notification of this event, nuclear design engineering personnel located the specific CR-3 Makeup System Hydraulic Analysis which contains a section for analyzing the HPI system for maximum Diesel Generator [EK,DG] loading. The scenario analyzed is for a HPI line break with one or two pumps operating. Open flow paths in this analysis include the Seal Injection Line and the normal Makeup flow path in addition to the 4 HPI injection lines. Maximum water levels for the Borated Water Storage Tank [BP,TK] and Makeup Tank are also used. RC System pressure is 200 pounds per square inch gauge (psig). For only one pump running, the limiting case as far as runout is concerned, the maximum flow developed per this model is 554.9 gpm. Given that HPI pump runout does not occur until 575 gpm, and since all of the conditions associated with the model are conservative except for RC system pressure, HPI pump runout may not be credible for the existing system configuration. Engineering cites the fact that Makeup Pump discharge stop check valves [BQ,V] are set to limit pump flow to 500 gpm at a RC System pressure of 600 psig and the above hydraulic analysis considers RC System pressure at 200 psig. Therefore, the only remaining question requiring analysis regarding HPI Pump runout is for a pressure below 200 psig which allows HPI termination and at which minimum Low Pressure Injection (LPI) flow rate is established. As noted in the Additional Corrective Actions section of this report, a hydraulic computer model will be run to resolve the HPI pump runout concerns. A supplement to this LER will be submitted when the results are known.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HOURS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON DC 20503.

FACILITY NAME (1) CRYSTAL RIVER UNIT 3 (CR-3)	DOCKET NUMBER (2)		LER NUMBER (6)			PAGE (3) 0 5 OF 0 8
			YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
	0 5 0 0 0 3 0 2	9 5	0 2 6	0 0		

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

CAUSE

The primary cause for this event is that, as more specific design basis information has been included in the Emergency Operating Procedures (EOP's), a corresponding update of Type A Variable reviews have not always been performed.

IMMEDIATE CORRECTIVE ACTION

Short Term Instruction (STI) 95-0081 was issued on November 10, 1995 with an effective date until February 8, 1996 instructing operators to isolate the RCP Seal Injection line whenever full HPI is required. This STI removes uncertainty about HPI pump flow pending resolution of issues involving qualification of MU-27-FI.

ADDITIONAL CORRECTIVE ACTION

1. MU-27-FI will be incorporated into a study to determine the need to upgrade/change instrumentation used on the Engineered Safeguards (ES) Section of the Main Control Board [MCBD]. This study was initiated as a result of another Problem Report involving EOP setpoints, and is intended to include all the findings from the EOP reviews currently ongoing that impact R.G. 1.97 instruments on the Main Control Board. The EOP Review Program should be sufficiently complete by April, 1996 to enable the above study to be initiated by August 1, 1996.
- 2a. FPC will re-run the PIPF-PC hydraulic computer model in Calculation M93-0047 "Makeup System Hydraulic Analysis" by January 15, 1996, for RCS pressure of 175 psig to determine the maximum anticipated HPI flow rate for comparison to the existing HPI pump runout value of 575 gpm. The value of 175 psig RCS pressure was determined by engineering review of vendor supplied pump curves for the LPI pumps [BP,P]. This review was performed based on a LPI flow rate of 1400 gpm which is necessary to meet HPI termination criteria.
- 2b. Based on the results of step 2a, above, STI 95-0081 will be rescinded by January 31, 1996.
- 2c. Based on the results of step 2a, above, changes will be made by July 1, 1996 to training lesson plans and simulator training to eliminate concerns regarding HPI pump runout.
3. FPC will incorporate by March 29, 1996, Babcock & Wilcox Document 32-1174002-00 "HPI Pinch Break Analysis" into the CR-3 Calculation system and add analyses of flow conditions performed as a result of this event.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HOURS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20565-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON DC 20503.

FACILITY NAME (1) CRYSTAL RIVER UNIT 3 (CR-3)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
	0 5 0 0 0 3 0 2	9 5	0 2 6	0 0	0 6 OF 0 8

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

- The Configuration Management Information System (CMIS) will be updated by March 29, 1996 to add calculation references to affected components.

ACTION TO PREVENT RECURRENCE

A new commitment has been added to the Nuclear Operations Control System (NOCS) to require a review for EOP changes to ensure that any Type A variables that have been added or deleted, are evaluated for corresponding changes to the Type A Variable Study. The commitment also addresses the need to modify any affected instrument string as necessary.

PREVIOUS SIMILAR EVENTS

There has been one similar event involving HPI Pumps and flow instrumentation. LER 89-37 reported instrumentation accuracy inadequacies to perform flow balancing during an HPI Line Break. As part of the corrective action for the LER, a review was performed of the effects of HPI line pinch and guillotine breaks such as HPI flow to the core and HPI pump runout. No additional procedure or plant changes were identified beyond addition of qualified flow instruments.

ATTACHMENT

Attachment 1 -Abbreviations, Definitions and Acronyms

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HOURS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON DC 20503.

FACILITY NAME (1) CRYSTAL RIVER UNIT 3 (CR-3)	DOCKET NUMBER (2)		LER NUMBER (6)			PAGE (3)													
			YEAR	SEQUENTIAL NUMBER	REVISION NUMBER														
	0	5	0	0	0		3	0	2	9	5	0	2	6	0	0	0	7	OF

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

ATTACHMENT 1 - ABBREVIATIONS, DEFINITIONS AND ACRONYMS

- Categor : These R.G. 1.97 measurements are key variables with the most stringent requirements.
- CR-3 Crystal River Unit 3
- ECCS Emergency Core Cooling Systems
- EOP Emergency Operating Procedure
- FPC Florida Power Corporation
- HPI High Pressure Injection
- LPI Low Pressure Injection
- MODE ONE POWER OPERATION (Greater Than 5 Percent Rated Thermal Power)
- MU Makeup and Purification System
- Problem Report Documents a condition or event which warrants evaluation, root cause analysis, or corrective actions beyond what it would receive if documented and processed by other methods.
- R.G. 1.97 "Instrumentation for Nuclear Power Plants to Assess Plant and Environs Conditions During and Following and Accident"
- Runout Operation of a pump beyond its design capacity; indicated by a decrease in discharge head and excessive power consumption.
- SBLOCA Small Break Loss-of-Coolant Accident
- Type A Those plant specific variables described in R.G. 1.97 that provide primary information needed to permit the control room operator to take the specified manually controlled actions for which no automatic control is provided and that are required for safety systems to accomplish their safety function for design basis accident events.

NOTES: ITS defined terms appear capitalized in LER text (e.g. MODE ONE)

Defined terms/acronyms/abbreviations appear in parentheses when first used (e.g. Reactor Building (RB)).

EIIS codes appear in square brackets (e.g. Makeup Tank [CB,TK])

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HOURS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON DC 20503.

FACILITY NAME (1) CRYSTAL RIVER UNIT 3 (CR-3)	DOCKET NUMBER (2) 0 5 0 0 0 3 0 2	LER NUMBER (6)			PAGE (3) 9 5 --- 0 2 6 --- 0 0 0 8 OF 0 8
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	

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

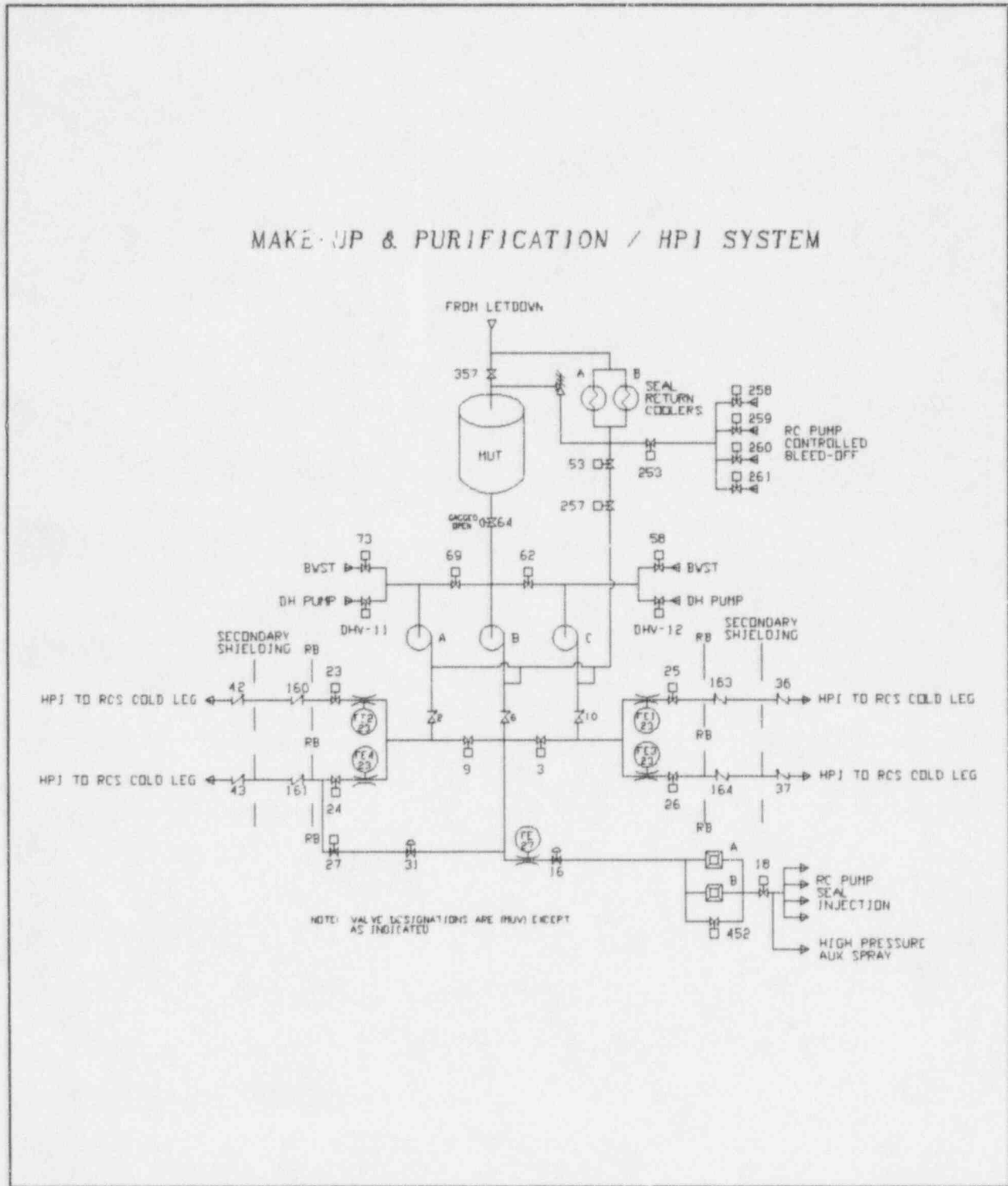


Figure 1