

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 7
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TITLE (4) Defective Procedure Leads to Misinterpretation of Surveillance Requirements and Causes Missed Surveillance

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 4	2 2	8 8	8 8	0 1 1	0 0 0	0 5	2 3	8 8	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(e)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10) 1 0 0	20.406(a)(1)(i)	50.38(a)(1)	50.73(a)(2)(v)	73.71(c)
	20.406(a)(1)(ii)	50.38(a)(2)	50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	20.406(a)(1)(iii)	X 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)	

LICENSEE CONTACT FOR THIS LER (12)

NAME L. W. Moffatt, Nuclear Safety Supervisor	TELEPHONE NUMBER AREA CODE 9 0 4 7 9 5 - 6 4 8 6
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

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

On April 22, 1988 Crystal River Unit 3 was operating in Mode 1 (power operation) at 100% rated thermal power, producing 892 Mwe. At 1000, during a normal review of Surveillance Procedure data, it was discovered that the Inservice Testing Program quarterly valve stroke testing was only partially completed in the first quarter of 1988. Crystal River Unit 3 Technical Specification 4.0.5 requires that an Inservice Testing Program, which includes the valve stroke testing, be conducted in accordance with the ASME Boiler and Pressure Vessel Code, Section XI (Section XI). Section XI requires the quarterly valve stroke testing of ASME Code class 1, 2 and 3 valves. This event was caused by a defective procedure. The Master Surveillance Plan procedure, which schedules all Technical Specification surveillances, did not give adequate guidance on the scheduling requirements for the Section XI tests. The Master Surveillance Plan will be revised to include the needed information. There was no immediate corrective action taken or required. The valve stroke testing had been performed on schedule for the second quarter of 1988 prior to the deficiency being discovered. Since the testing was complete, and all the valves had performed satisfactorily, there was no immediate action needed.

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

EVENT DESCRIPTION

On April 22, 1988 Crystal River Unit 3 was operating in Mode 1 (power operation) at 100% rated thermal power, producing 892 Mwe. At 1000, during a normal review of Surveillance Procedure data, it was discovered that the Inservice Testing Program quarterly valve stroke testing was only partially completed in the first quarter of 1988. Crystal River Unit 3 Technical Specification 4.0.5 requires an Inservice Testing Program, which includes the valve stroke testing, be conducted in accordance with the ASME Boiler and Pressure Vessel Code, Section XI (Section XI). Section XI requires the quarterly valve stroke testing of ASME Code class 1, 2 and 3 valves.

Quarterly valve stroke testing was completed on December 29, 1987, during a unit startup from refueling. This testing was performed to verify operability of the valves prior to placing them in service as is required by Section XI paragraph IWV-3416.

On January 15, 1988, performance of the quarterly valve stroke testing was due again on the routine quarterly schedule. Continuation of the quarterly test schedule is required by Section XI paragraphs IWV-3416 and IWV-3411. The need to repeat the testing in January was questioned by a licensed plant operator since it had been performed in December during the plant startup. The Master Surveillance Plan was consulted for guidance on the scheduling requirements. Based upon the information in the Master Surveillance Plan, it was decided to schedule the valve stroke testing for April 1988.

The April 1988 due date for the next test was thought to be acceptable because the Master Surveillance Plan references Technical Specification 4.0.2, which allows an extension of the surveillance interval of up to 25%. The interval between the December 1987 test and the April 1988 test is within this 25% Technical Specification window, but it is not within the testing requirements of Section XI.

The failure to complete the quarterly valve stroke testing is considered to be an operation or condition prohibited by Crystal River Unit 3 Technical Specification 4.0.5(b) and is reportable under 10 CFR 50.73(a)(2)(i)(B). A listing of the valves not tested in the first quarter of 1988 is attached (Attachment 1).

CAUSE OF EVENT

This event was caused by a defective procedure.

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TEXT (If more space is required, use additional NRC Form 366A (1) (17))

All Crystal River Unit 3 Technical Specification surveillance requirements are scheduled through the "Master Surveillance Plan" procedure. This procedure lists all surveillance procedures, the frequency of performance, and responsibility for the performance of the surveillance. The Master Surveillance Plan lists numerous surveillance procedures performed in accordance with Section XI, but does not reference Technical Specification 4.0.5. Technical Specification 4.0.5 requires an Inservice Testing Program be implemented in accordance with Section XI, and then specifies the provisions of Technical Specification 4.0.2 do not apply to the inservice testing program. Technical Specification 4.0.2 provides allowable extensions to the surveillance intervals required by the Technical Specifications. The Master Surveillance Plan references Technical Specification 4.0.2 without qualification. Apparently, the inconsistency in the application of different types of surveillance requirements was not recognized when the Master Surveillance Plan was developed.

Omission of the reference to Technical Specification 4.0.5 from the Master Surveillance Plan was the cause of the misinterpretation of the requirements. The actions based on this interpretation of the Master Surveillance Plan did not comply with ASME Section XI, paragraph IWV-3416 and IWV-3411.

CORRECTIVE ACTION

There was no immediate corrective action taken or required. The valve stroke testing had been performed on schedule for the second quarter of 1988 prior to the deficiency being discovered. Since the testing was complete, and all the valves had performed satisfactorily, there was no immediate action needed.

To prevent recurrence, the Master Surveillance Plan will be revised to reference Technical Specification 4.0.5, to note the ASME Section XI test frequency is controlled by Section XI, and to note surveillances where the provisions of Technical Specification 4.0.2 are not applicable to the surveillance intervals.

EVENT ANALYSIS

This event was administrative in nature. No equipment failed or malfunctioned as a result of this event. Quarterly valve stroke testing is performed to verify the operational readiness in ASME Code Class 1, 2 and 3 systems. All quarterly valve stroke testing was completed in April 1988 and all valves functioned as expected. Therefore, the health and safety of the public were not affected by the event.

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PREVIOUS SIMILAR OCCURRENCES

One previous event was identified which reported a missed surveillance due to misinterpretation of surveillance requirements. This event was the subject of a voluntary report dated February 23, 1987, and identified by number 3F0287-21.

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

**ATTACHMENT 1
VALVES NOT STROKE TESTED IN THE FIRST QUARTER 1988**

VALVE TAG NUMBER ¹	SYSTEM/ COMPONENT CODE	DESCRIPTION OF VALVE
CAV-2	* [CB, ISV]	Pressurizer Steam space sample isolation
CAV-6	* [CB, ISV]	OTSG A sample isolation valve
CAV-7	* [CB, ISV]	OTSG B sample isolation valve
CAV-57	[CB, ISV]	Boric acid pump to MU System isolation
CAV-60	[CB, ISV]	Boric acid pump to MU System isolation
CFV-11	* [BP, ISV]	CFT A sample isolation valve
CFV-12	* [BP, ISV]	CFT B sample isolation valve
CFV-15	* [BP, ISV]	CFT B vent to WGDT isolation valve
CFV-16	* [BP, ISV]	CFT A vent to WGDT isolation valve
CFV-25	* [BP, ISV]	CFT A fill and makeup isolation valve
CFV-26	* [BP, ISV]	CFT B fill and makeup isolation valve
CFV-27	* [BP, ISV]	CFT B Nitrogen makeup isolation valve
CFV-28	* [BP, ISV]	CFT A Nitrogen makeup isolation valve
CFV-29	* [BP, ISV]	CFTs isolation valve to WD system
CFV-42	* [BP, ISV]	CFTs isolation valve to sample and WD system
CIV-34	* [KM, ISV]	CI inlet to "A" RB Fan cooler isolation valve
CIV-35	* [KM, ISV]	CI outlet from "A" RB Fan cooler isolation
CIV-40	* [KM, ISV]	CI outlet from "B" RB Fan cooler isolation
CIV-41	* [KM, ISV]	CI inlet to "B" RB Fan cooler isolation valve
WDV-4	* [WD, ISV]	RB Sump pump discharge isolation valve
WDV-62	* [WD, ISV]	RCDT pump discharge isolation valve
WSV-3	* [IP, ISV]	PASS RB atmosphere sample isolation valve
WSV-4	* [IP, ISV]	PASS RB atmosphere sample isolation valve
WSV-5	* [IP, ISV]	PASS RB atmosphere sample isolation valve
WSV-6	* [IP, ISV]	PASS RB atmosphere sample isolation valve
ASV-195	[SA, ISV]	Aux Steam to aux bldg equipment isolation
ASV-196	[SA, ISV]	Aux Steam to aux bldg equipment isolation
BSV-11	[BE, ISV]	NaOH Tank to BSP 1B isolation valve
BSV-12	[BE, ISV]	NaOH Tank to BSP 1A isolation valve
CAV-1	* [CB, ISV]	Pressurizer Steam Space Sample isolation vlv
CAV-3	* [CB, ISV]	Pressurizer Water Space Sample isolation vlv
CAV-4	* [CB, ISV]	OTSG A Sample isolation valve
CAV-5	* [CB, ISV]	OTSG B Sample isolation valve
CAV-126	* [CB, ISV]	RC letdown sample line isolation valve
CAV-431	* [CB, ISV]	PASS RC sample line isolation valve
DHV-91	* [BP, ISV]	DH System to PZR spray isolation valve
DOV-238	* [KK, ISV]	Domestic water SW cross connect isolation
DOV-210	* [KK, ISV]	Domestic water SW cross connect isolation

¹ " * " Denotes a containment isolation valve.

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**ATTACHMENT 1
 VALVES NOT STROKE TESTED IN THE FIRST QUARTER 1988**

VALVE TAG NUMBER ¹	SYSTEM/ COMPONENT CODE	DESCRIPTION OF VALVE
DWV-160 *	[KC, ISV]	Demin water supply to RB isolation valve
RCV-11	[AB, ISV]	Pressurizer PORV Block valve
WDV-3 *	[WD, ISV]	RB Sump pump discharge isolation valve
WDV-60 *	[WD, ISV]	RCDT vent line isolation valve
WDV-61 *	[WD, ISV]	RCDT vent line isolation valve
WDV-94 *	[WD, ISV]	RCDT pump discharge isolation valve
WDV-405 *	[WD, ISV]	RB Vent header isolation valve
WDV-406 *	[WD, ISV]	RB Vent header isolation valve
DOV-123	[WD, ISV]	DO supply to DO pumps isolation valve
EFV-12	[WD, ISV]	EFP discharge cross connect isolation valve
EFV-13	[WD, ISV]	EFP discharge cross connect isolation valve

¹ " * " Denotes a containment isolation valve.

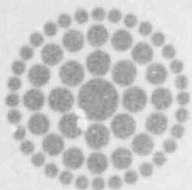
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ATTACHMENT 1
VALVES NOT STROKE TESTED IN THE FIRST QUARTER 1988
 ABBREVIATIONS USED IN THIS TABLE

OTSG	Once Through Steam Generator
MU System	Make Up System
CFT	Core Flooding Tank
WGDT	Waste Gas Decay Tank
WD	Waste Disposal
CI	Industrial Cooling
RB	Reactor Containment Building
RCDT	Reactor Coolant Drain Tank
PASS	Post Accident Sampling System
Aux Bldg	Auxiliary Building
NaOH	Sodium Hydroxide
BSP	(reactor) Building Spray Pump
RC	Reactor Coolant
PZR	Pressurizer
DH	Decay Heat
SW	Nuclear Services Closed Cycle Cooling Water
DO	Domestic (potable) Water
EFP	Emergency Feedwater Pump



**Florida
Power**
CORPORATION

May 23, 1988
3F0588-13

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

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Licensee Event Report No. 88-011-00

Dear Sir:

Enclosed is Licensee Event Report (LER) 88-011-00 which is
submitted in accordance with 10 CFR 50.73.

Should there be any questions, please contact this office.

Sincerely,

R. Q. Widell
Director,
Nuclear Operations Site Support

WLR:mag

Enclosure

xc: Dr. J. Nelson Grace
Regional Administrator, Region II

Mr. T. F. Stetka
Senior Resident Inspector

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