

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <b>CRYSTAL RIVER UNIT 3</b>	DOCKET NUMBER (2) <b>0 5 0 0 0 3 1 0 2</b>	PAGE (3) <b>1 OF 0 1 3</b>
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TITLE (4) **FAILURE TO VERIFY EQUIPMENT OPERABILITY PRIOR TO ENTERING TECHNICAL SPECIFICATION APPLICABILITY CONDITIONS**

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		
0	8	0	8	5	0	0	1	2	N/A		
9	8	5	0	3	4	0	5	8	N/A		
8	5	8	0	0	1	0	5	8	DOCKET NUMBER(S) 0 5 0 0 0		

OPERATING MODE (9) <b>3</b>	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)				
POWER LEVEL (10) <b>0 1 0 0</b>	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	<input type="checkbox"/> 20.406(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)	
	<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)		
	<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 <b>L. W. Moffatt, Nuclear Safety Supervisor</b>	TELEPHONE NUMBER
	AREA CODE: <b>9 0 4</b> NUMBER: <b>7 9 5 - 1 6 4 8 1 6</b>

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)

YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

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

Technical Specification (T.S.) 3.5.1 requires the core flood tank isolation valves (CFV-5 and CFV-6) to be operable when in Modes 1, 2 and 3 with system pressure greater than 750 psig. T.S. Surveillance 4.5.1.d requires the "Valve Not Open" alarm annunciator to be tested at a system pressure above 750 psig. In addition T.S. 4.0.4 prohibits mode ascension or changes in specified applicability conditions, unless the applicable surveillances have been performed within the required surveillance period. The combined requirements of the above T.S. items presents a difficult situation when ascending modes from Mode 4 and the valve alarm function is inoperable. During the plant shutdown on March 10, 1985, the valve alarm function for CFV-5 failed to meet the acceptance criteria and corrective maintenance was performed during the outage. On August 9, 1985, CR-3 entered Mode 3 and then raised Reactor Coolant System pressure above 750 psig without meeting the required operability surveillances for T.S. 3.5.1.a. As required by the surveillance procedure, the necessary testing was performed in Mode 3. The system pressure was increased above 750 psig and CFV-5 was cycled closed and open. The alarm annunciator functioned properly. The event was discovered as a result of a Quality Programs Department audit and evaluated as reportable on November 6, 1986.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

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

EVENT DESCRIPTION

Technical Specification (T.S.) 3.5.1 requires the core flood tank isolation valves (CFV-5 and CFV-6) to be operable when in Modes 1, 2 and 3 with system pressure greater than 750 psig. T.S. Surveillance 4.5.1.d requires the "Valve Not Open" alarm annunciator to be tested at a system pressure above 750 psig. In addition T.S. 4.0.4 prohibits mode ascension or changes in specified applicability conditions, unless the applicable surveillances have been performed within the required surveillance period.

The combined requirements of the above T.S. items and pressure/temperature limits presents a difficult situation when ascending from Mode 4 and the valve alarm function is inoperable due to the expiration of its surveillance time interval or corrective maintenance. Usually this is not a concern because the valve alarm function is tested during plant shutdown or because the surveillance interval has not expired prior to mode ascension. However, during the plant shutdown on March 10, 1985, the valve alarm function for CFV-5 failed to meet the acceptance criteria of SP-402, Core Flooding System Isolation Valves Alarms Actuation. Corrective maintenance was performed during the outage but operability could not be verified until the surveillance was performed with system pressure above 750 psig.

On August 9, 1985, Crystal River 3 (CR-3) was performing a plant heatup following Refueling Outage 5. CR-3 entered Mode 3 and then raised Reactor Coolant System pressure above 750 psig without meeting the required operability surveillances for T.S. 3.5.1.a. Because core flood tank isolation valve CFV-5 was technically inoperable and because it had to be cycled closed and open for testing, CR-3 effectively entered Mode 3 and increased pressure above 750 psig under the 1 hour Action Statement of T.S. 3.5.1.a and in violation of T.S. 4.0.4. This fact was not recognized at the time.

As required by Surveillance Procedure SP-402, the necessary testing was scheduled to be performed in Mode 3. The Reactor Coolant System pressure was increased above 750 psig and CFV-5 was then cycled closed and open. The alarm annunciator functioned properly and SP-402 was transmitted as satisfactory.

The event was discovered as a result of a Quality Programs Department audit and on November 6, 1986 and was evaluated as reportable.

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		8 5	- 0 3 4	- 0 0	0 3	OF	0 3

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

CAUSE

Because of the given T.S. constraints, the cause of the event is inadequacy in the Surveillance Procedure SP-402. The procedure required all testing to be performed in Mode 3. Therefore, it failed to recognize and provide adequate guidance for the unique circumstances encountered when ascending modes or changing specified applicability conditions.

EVENT ANALYSIS

The Final Safety Analysis Report states: 1) The Technical Specifications require the Core Flood Tank isolation valves to be open and locked (electrically de-energized) prior to bringing the reactor critical; and 2) the Core Flood Tank isolation valves are open during power operation.

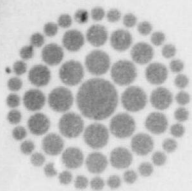
This event did not present any hazard to the safety of the public because: 1) the plant was in a mode which prohibited criticality and power operation; and 2) the alarm annunciator was verified to be operable prior to entering a mode allowing power operation.

CORRECTIVE ACTION

SP-402 has been changed to reflect that on startup, when surveillance requirements must be satisfied prior to exceeding 750 psig in Mode 3, then the requirements will have to be satisfied in Mode 4.

PREVIOUS SIMILAR EVENTS

A review of LER history identified one previous similar event which was reported in LER 83-50.



**Florida  
Power**  
CORPORATION

December 5, 1986  
3F1286-09

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. 85-034-00

Dear Sir:

Enclosed is Licensee Event Report (LER) No. 85-034-00 which is submitted in accordance with 10 CFR 50.73.

Sincerely,

Rolf C. Wideell  
Manager, Nuclear Operations  
Licensing and Fuel Management

AEF/feb

Enclosure

xc: Dr. J. Nelson Grace  
Regional Administrator, Region II  
U.S. Nuclear Regulatory Commission  
101 Marietta Street N.W., Suite 2900  
Atlanta, GA 30323

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