NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/85

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
CRYSTAL RIVER UNIT 3	0 5 0 0 0 3 0 2	1 OF 0 4

TITLE (4)
Post Accident Monitoring Not Being Tested as Required by STS Because of Personnel Error

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 0	8 7	8 7	— 0 0 8	— 0 0	0 6	2 5	8 7	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)	0 9 3	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	X 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	TELEPHONE NUMBER
L. W. MCFFATT, NUCLEAR SAFETY SUPERVISOR	AREA CODE 9 0 4 — 7 9 5 - 6 4 8 6

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)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

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

On April 20, 1987, while operating at 93% RTP and generating 828 MWe, Crystal River Unit 3 failed to comply with STS 4.3.3.6. A monthly channel check was not being performed on post-accident monitor recorders and a quarterly channel calibration was not being performed on the power range nuclear flux recorder.

A channel check was not being performed because of a deficiency in handling administrative procedures. A corrective action assignment was prematurely closed when a procedure change was initiated versus waiting for the change to be issued.

A quarterly channel calibration was not being performed on NI-5-NIR, nuclear power range flux recorder, because the different frequency for that recorder was overlooked when reviewing Amendment 60 to STS.

Surveillance procedure SP-300, Daily Operation Surveillance Log, was revised to include a channel check on the post-accident monitoring recorders.

SP-113, Power range Nuclear Instrumentation Calibration, has been revised to include a quarterly calibration of NI-5-NIR and was performed on June 12, 1987.

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

EVENT DESCRIPTION

On April 20, 1987, while operating at 93% RTP and generating 828 MWe the NRC Resident Inspector notified Crystal River Unit 3 of a violation of Technical Specification 4.3.3.6. Technical Specification 4.3.3.6. requires that the post-accident monitoring instrumentation, including recorders, be demonstrated operable by the performance of monthly channel checks and quarterly or refueling interval channel calibrations.

Contrary to the above, as of April 2, 1987, monthly channel checks on the recorders for the following post accident monitoring instrumentation were not performed: power range nuclear flux (JR), source range nuclear flux (JR), reactor coolant outlet temperature (TR), and borated water storage tank level (LR). In addition, quarterly channel calibrations for the power range nuclear flux recorder and refueling interval calibration of the reactor coolant total flow rate recorder were not performed.

This event is being reported under 10 CFR 50.73 a (2) (i) (B), which states that the licensee shall report any operation or condition prohibited by the plant's Technical Specifications.

On December 8, 1983, a post-accident monitoring recorder, (PR) BS-65-PR (a multipoint recorder) was determined to be inoperable because of discrepancies in electrical drawings for a plant modification (LER 83-62). Part of the corrective actions for this event was to revise SP-300, Daily Operating Surveillance Log, to ensure that the recorders identified in Technical Specification 3.3.3.6 were checked for operability each shift. For reasons unknown, this revision to SP-300 was not approved and issued. The corrective action assignment was prematurely closed when the proposed revision was submitted for approval. Investigation of this earlier event by the NRC Resident Inspector led to this citation for violation of Technical Specification 4.3.3.6.

On May 18, 1987 Florida Power Corporation determined that a Licensee Event Report (LER) would not be filed on this event because a violation response was being submitted. Later, on May 27, 1987, it was determined that the violation response would not satisfy the requirement to file a LER. Therefore, this report is being filed late.

CAUSE

Amendment 60 to Technical Specification 4.3.3.6. added the requirement for channel checks and channel calibrations to be performed on post-accident monitoring instrumentation recorders. LER 83-62 identified several channel checks that were not being performed. Appropriate procedure changes were initiated at that time to correct this deficiency. However, the corrective action assignment to implement the channel checks was prematurely closed when the proposed revision was submitted for approval. The procedure change was never issued.

As a result of the issuance of Amendment 60, all post-accident monitoring recorders except NI-5-NIR were required to be calibrated every refueling. The calibration frequency for NI-5-NIR was specified as quarterly. During the review of Amendment 60, the difference in calibration frequency was not noticed.

CORRECTIVE ACTIONS:

1. Surveillance Procedure SP-300, Daily Operating Surveillance Log, has been revised to include a channel check for the Power Range Nuclear Flux Recorders (NI-5-NIR), Source Range Nuclear Flux Recorder (NI-9-NIR), Reactor Coolant Outlet Temperature Recorder (RC-4-TR), and BWST Level and RB Pressure Recorder (BS-65-PR).

2. FPC no longer accepts the initiation of the procedure change to satisfy a corrective action assignment. The procedure change must be approved by the Plant Review Committee and issued by Document Control.

3. Upon notification of the violation, the NI-5-NIR post accident monitoring channel was declared inoperable, and the applicable action statement was entered. The recorder was bench calibrated and the action statement was exited.

   Technical Specification 4.3.3.6 was interpreted by Florida Power Corporation to apply to the power range flux post-accident recorder (NI-5-NIR) as a separate entity. It was FPC position that due to difficulty of calibrating this equipment while in modes 1 or 2, the portions of the string that do not support Reactor Protection System functions would still require calibration once a refueling. This was based upon concern that the only apparent method for achieving a full calibration involved placing several ICS stations in "hand" simultaneously and concurrent entry into two reactor protective cabinets. Following discussions with the NRC on May 26, 1987, it was agreed that the proper interpretation of the technical specification included all components of the instrumentation string. The original NCOR was reevaluated as reportable and the action statement was re-entered on May 27, 1987.

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4. Surveillance Procedure SP-113, Power Range Nuclear Instrumentation Calibration, has been revised to include quarterly calibration of the nuclear power range flux recorder, NI-5-NIR, and the active components between the NI Power Range Detectors and the Recorder. This calibration was performed on June 12, 1987.

5. In addition, due to the relative difficulty of performing the calibration of NI-5-NIR during power operation, and due to the fact that there is no technical reason that the power range nuclear flux post-accident recorder should require more frequent calibrations than any of the other post-accident recorders, a technical specification change will be initiated to change the calibration frequency of the power range nuclear flux post-accident recorder to once per 18 months.

SAFETY CONCERNS:

The function of the recorders associated with the post-accident monitoring instrumentation is to provide historical data. No accident mitigation functions are automatically initiated by these instruments, therefore the health and safety of the public was not compromised.

SIMILAR EVENTS:

No previous events reported due to inadequate review of an amendment to technical specifications or premature closure of a corrective assignment.

Florida Power
CORPORATION

June 25, 1987
3F0687-15

U. S. Nuclear Regulatory Commission
Attn: 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. 87-008-00

Dear Sir:

Enclosed is Licensee Event Report (LER) No. 87-008-00 which is submitted in accordance with 10 CFR 50.73.

Should there be any questions, please contact this office.

Sincerely,

E C Simpson

E. C. Simpson
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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