FEB 24 1989

MEMORANDUM FOR: James M. Taylor, Deputy Executive Director for Nuclear Reactor Regulation, Regional Operations and Research
Thomas E. Murley, Director, Office of Nuclear Reactor Regulation
James Lieberman, Director, Office of Enforcement

FROM: Malcolm L. Ernst, Acting Regional Administrator

SUBJECT: ENFORCEMENT DISCRETION FOR CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302

In accordance with the February 27, 1987, memorandum to Regional Administrators from H. R. Denton and J. M. Taylor regarding relief from Technical Specifications limiting conditions for operation, on February 18, 1989, Region II granted discretionary enforcement to Technical Specification 4.3.1.1.1, which requires a monthly channel functional test, due on February 20, 1989, of the pump power monitors. The discretionary enforcement was required because the unit is operating with three reactor coolant pumps due to a failure of the fourth pump. Since one of the reactor coolant pumps is shut down, the associated reactor coolant pump power monitor (RCPPM) channel is tripped. The tripping of any of the other three channels will result in a reactor trip. To run the required surveillance, it is necessary to trip each of the channels to verify the setpoint. Because of the Technical Specification wording, the licensee has interpreted the action statement as not allowing bypassing an already tripped channel to run the channel functional test.

Enclosed with this memorandum is the Region II letter to the licensee authorizing discretionary enforcement, and the licensee's request. The basis for granting the discretionary enforcement is that the plant will be shut down no later than February 28, 1989, to repair the failed reactor coolant pump thereby extending the interval by no more than eight days, less than twice the normal interval.

Prior to relief being granted, the technical issues and extent of enforcement discretion were discussed with B. Wilson and L. Reyes of Region II; H. Silver, H. Berkow, E. Adensam, S. Newberry and W. Hodges of NRR, and K. Wilson and P. McKee of Florida Power Corporation. Subsequent to granting enforcement discretion, G. Lainas of NRR was notified.

Original signed by
J. Philip Stohr (for)
Malcolm L. Ernst

Enclosures: (See page 2)

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Enclosures:
1. FPC letter to NRC dated
   February 14, 1989
2. NRC letter to FPC dated
   February 24, 1989

cc w/encls:
H. Berkow, Project Director
Directorate, II-2, NRR

RII
RCrlenjak
02/[illegible]/89

RII
BWilson
02/[illegible]89

RII
LReyes
02/24/89

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GJenkins
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ENCLOSURE 1

89 FEB 17 P1:38

Florida Power
CORPORATION

February 14, 1989
3F0289-12

Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street N. W., Suite 2900
Atlanta, GA 30323

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Reactor Coolant Pump Power Monitor Surveillance

Dear Sir:

Florida Power Corporation (FPC) hereby requests discretionary enforcement associated with the performance of the surveillance required by Technical Specification 4.3.1.1.1. The attached summary supports the conclusion that such action will not adversely impact the public health and safety. In our letter of January 31, 1989 (3F0189-20), FPC proposed two alternative resolution strategies. The staff indicated that this course of action was the most appropriate.

Should there be any questions, please contact this office.

Sincerely,

Rolf C. Widell, Director
Nuclear Site Support

AEF:

Attachment

xc: Mr. P. Holmes-Ray
Senior Resident Inspector

Document Control Desk

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REACTOR COOLANT PUMP POWER MONITOR
MONTHLY CHANNEL FUNCTIONAL TEST

BACKGROUND

Crystal River Unit 3 (CR-3) is currently operating at approximately 75% power on three reactor coolant pumps due to a failure of the "A" pump. Florida Power Corporation (FPC) plans to operate in this configuration until the unit is shut down for repair. This outage will begin no later than February 28, 1989 and is currently scheduled for February 23, 1989.

Since one of the reactor coolant pumps is shut down, the associated reactor coolant pump power monitor (RCPPM) channel is tripped. The tripping of any of the other three channels will result in a reactor trip. Technical Specifications 4.3.1.1.1 requires a monthly channel functional test of the pump power monitors. To run this test, it is necessary to trip each of the channels to verify the setpoint. Since one of the channels is already tripped, it is not possible to run this test without bypassing the tripped channel or tripping the reactor. The Technical Specifications allow bypassing of an RCPPM channel, however, this renders the channel inoperable and necessitates entry into the associated Technical Specification Action Statement. The Action Statement associated with the RCPPM's reads, "With the number of channels OPERABLE one less than the required Minimum Channels OPERABLE requirement, plant operation may continue until the next required Channel Functional Test provided the inoperable channel is placed in the tripped condition within 4 hours." As a result of this wording, the Action Statement does not appear to clearly allow bypassing a tripped channel to run the channel functional test.

The current surveillance window for this specification will expire on February 20, 1989. FPC believes it is inappropriate to place the plant in a non-applicable mode (Mode 3, Hot Standby) merely to run this test. FPC does not plan to shut down to repair the reactor coolant pump until after that date as noted above.

PROPOSED ACTION

To avoid an unnecessary plant shut down, FPC proposes to delay the performance of the next monthly test until the plant is restarted following the repair of the reactor coolant pump.

Since these actions will have received prior NRC review, the requirements of 10 CFR 50.72 and 50.73 would not be considered applicable.

SAFETY IMPACT

The safety impact is negligible. The actual surveillance interval for the RCPPM's would be less than twice the normal interval. The B&W Owners Group has submitted a topical report, Justification for Increasing the Reactor Trip System On-line Test Intervals (BAW-10167).

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

FEB 24 1989

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NFORCEMENT TO ALLOW CONTINUED OPERATION WITH REAC
ER MONITOR CHANNELS TECHNICAL SPECIFICATION TOR
T PERFORMED

your letter dated February 14, 1989, requesti
associated with the performance of the surveill
ecification 4.3.1.1.1, Reactor Coolant Pump Powance
is request is limited to the time period prior er
presently scheduled to begin no later than to

quest which included discussions with your sta
ry 23, 1989, and the request was subsequently graf
with Region II staff on February 16, 1989. nted

ons concerning this letter, please contact us.

Sincerely,

Malcolm L. Ernst
Acting Regional Administrator

Nuclear
ator

That report indicates it may be possible to increase the surveillance interval by as much as six times without any significant impact on safety. Since the interval would be extended by much less than that amount, and since the extension would be for only one time, the probability the RCPPM's would fail to perform their intended safety function, should they be called upon, is minimal. Delaying the running of the test will allow FPC to avoid work in the Reactor Protection System cabinets while the system is in an unusual configuration. This eliminates the possibility of an inadvertent reactor trip as a result of this work.

REQUEST

FPC requests NRC exercise discretionary enforcement by indicating concurrence with this plan.