



April 19, 2013
L-2013-140

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-001

Re: Turkey Point Unit 4
Docket No. 50-251
Special Report - Accident Monitoring Instrumentation

In accordance with Technical Specifications 6.9.2 and 3.3.3.3, the attached Special Report is provided for your information.

Should there be any questions regarding this information, please contact Robert J. Tomonto, Licensing Manager at (305) 246-7327.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Kiley', is written below the 'Sincerely,' text.

Michael Kiley
Vice President
Turkey Point Nuclear Plant

SM

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

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MRK

SPECIAL REPORT

Purpose:

This special report is being submitted pursuant to the requirements of Turkey Point Unit 4 Technical Specification (TS) 3.3.3.3, Table 3.3-5, Accident Monitoring Instrumentation, Action 34, part 2) due to the Condenser Air Ejector for High Range-Noble Gas Effluent Monitor (RAD-4-6417) being inoperable for greater than 7 days.

Required Action 34 of TS 3.3.3.3, Table 3.3-5, Item 19.c, states:

"With the number of OPERABLE Channels less than required by the Minimum Channels OPERABLE requirements, initiate the preplanned alternate method of monitoring the appropriate parameter(s), within 72 hours, and:

- 1) Either restore the inoperable channel(s) to OPERABLE status within 7 days of the event, or
- 2) Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 14 days outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status."

This Special Report is being transmitted in accordance with these requirements.

Event and Action Taken:

RAD-4-6417 consists of three channels with the following ranges to cover the total range required (1.0 E-06 to 1.0 E05 $\mu\text{Ci/cc}$):

High Range	Channel 9:	1.0 E00 to 1.0 E+05 $\mu\text{Ci/cc}$
Mid Range	Channel 7:	2.5 E-02 to 4.0 E+02 $\mu\text{Ci/cc}$
Low Range	Channel 5:	1.0 E-07 to 6.0 E-02 $\mu\text{Ci/cc}$

On March 31, 2013 at approximately 1434, Turkey Point Unit 4 entered Mode 3, returning to power from the Unit 4 Extended Power Uprate (EPU) Refueling Outage.

In accordance with TS 3.3.3.3, Table 3.3-5, Item 19.c., the Condenser Air Ejector Noble Gas Effluent Monitor is required to be OPERABLE for Modes 1-3. At that time, the Main Steam Isolation Valves (MSIVs) were closed resulting in no sample flow to RAD-4-6417. Additionally, the condenser Steam Jet Air Ejector Hogging Jet was in service establishing plant conditions that do not support the sample flow rate required to allow the monitor to be in service. Due to the plant line up, RAD-4-6417 was rendered inoperable when Turkey Point Unit 4 entered Mode 3. Since RAD-4-6417 was not restored to service within 7 days (by April 6, 2013) as required by TS 3.3.3.3, Table 3.3-5, Action 34, this special report is prepared and submitted within the next 14 days to comply with the TS Action 34 requirements.

The pre-planned alternate method of monitoring the appropriate parameters was previously established during Mode 4. On March 31, 2013, the method utilized was grab samples, once per 8 hours from each steam generator to perform isotopic activity and tritium analysis.

Cause:

The sample flow path for RAD-4-6417 was either not available by having the MSIVs closed or bypassed by the plant lineup required to maintain condenser vacuum by the hogging jet air ejector, which rendered monitor RAD-4-6417 inoperable.

Schedule for Restoration:

The Turkey Point Unit 4 Condenser Air Ejector for High Range-Noble Gas Effluent Monitor will be restored to service when plant lineup is restored to maintain condenser vacuum with the condenser steam jet air ejectors, and with the MSIVs open, allowing the required sample flow to test and place monitor RAD-4-6417 in service.