

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8707150171 DOC. DATE: 87/07/06 NOTARIZED: NO DOCKET #
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 AUTH. NAME AUTHOR AFFILIATION
 SALAMON, G. Florida Power & Light Co.
 WOODY, C. O. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 87-019-00: on 870605, discovered that neither Unit 3 or 4
 had met surveillance requirements of Tecch Spec 3.10.8.
 Caused by failure to identify surveillance requirements upon
 issuance of license amends. Procedures revised. W/870706 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-2 LA	1 1	PD2-2 PD	1 1
	McDONALD, D	1 1		
INTERNAL:	ACRS MICHELSON	1 1	ACRS MOELLER	2 2
	AEOD/DOA	1 1	AEOD/DSP/ROAB	2 2
	AEOD/DSP/TPAB	1 1	DEDRO	1 1
	NRR/DEST/ADE	1 0	NRR/DEST/ADS	1 0
	NRR/DEST/CEB	1 1	NRR/DEST/ELB	1 1
	NRR/DEST/ICSB	1 1	NRR/DEST/MEB	1 1
	NRR/DEST/MTB	1 1	NRR/DEST/PSB	1 1
	NRR/DEST/RSB	1 1	NRR/DEST/SGB	1 1
	NRR/DLPQ/HFB	1 1	NRR/DLPQ/GAB	1 1
	NRR/DOEA/EAB	1 1	NRR/DREP/RAB	1 1
	NRR/DREP/RPB	2 2	NRR/PMAS/ILRB	1 1
	NRR/PMAS/PTSB	1 1	REG FILE 02	1 1
	RES DEPY GI	1 1	RES TELFORD, J	1 1
	RES/DE/EIB	1 1	RGN2 FILE 01	1 1
EXTERNAL:	EG&G GROH, M	5 5	H ST LOBBY WARD	1 1
	LPDR	1 1	NRC PDR	1 1
	NSIC HARRIS, J	1 1	NSIC MAYS, G	1 1

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Turkey Point Unit 3										DOCKET NUMBER (2) 0 5 0 0 0 2 5 0					PAGE (3) 1 OF 0 3		
TITLE (4) Missed Surveillance of Refueling Canal Boron Concentration Due to Inadequate Implementation of Technical Specification Amendment																	
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 6	0 5	8 7	8 7	0 1 9	0 0	0 7	0 6	8 7	Turkey Point Unit 4				0 5 0 0 0 2 5 1				
									N/A				0 5 0 0 0				
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)															
6		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)			
POWER LEVEL (10)		0 0 0				20.405(a)(1)(i)				50.73(a)(2)(v)				73.71(c)			
		20.405(a)(1)(ii)				50.38(c)(1)				50.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 365A)			
		20.405(a)(1)(iii)				50.38(c)(2)				50.73(a)(2)(vii)							
		20.405(a)(1)(iv)				X 50.73(a)(2)(i)				50.73(a)(2)(viii)(A)							
		20.405(a)(1)(v)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)							
		20.405(a)(1)(vi)				50.73(a)(2)(iii)				50.73(a)(2)(ix)							
LICENSEE CONTACT FOR THIS LER (12)																	
NAME Gabe Salamon, Compliance Engineer										TELEPHONE NUMBER AREA CODE 3 0 5 2 4 6 6 5 6 0							
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 June 5, 1987, with Unit 3 in mode 6 and Unit 4 in mode 5, it was discovered that neither unit had met the surveillance requirements of Technical Specification (TS) 3.10.8, which requires determination of the boron concentration of the reactor coolant system (RCS) and the refueling canal at least once per 72 hours while the unit is in mode 6. Procedures NC-67, "Additional Chemistry Surveillance During the Refueling Cooldown and Shutdown", and OP 16002.6, "Preparations and Precautions for Refueling Fuel Shuffle", required sampling of the reactor cavity within 8 hours before moving the first fuel assembly and at least once per 8 hour shift while fuel is being moved. With fuel not being moved, the boron concentration in the transfer canal was not being determined. The surveillance became mandatory in License Amendments 114 and 108, which were issued on June 27, 1985. The two causes of the missed surveillances were failure to identify the surveillance requirements upon the issuance of the License Amendments, and inadequate review of the TS requirements during the revision of procedure AP 0190.16, "Scheduling and Surveillance of Periodic Tests and Checks Required by Technical Specifications". TS section 3 will be reviewed and the surveillances identified will be incorporated into procedure AP 0190.16. Procedure NC-67 will be revised to include the boron analysis of the reactor cavity when the cavity is filled.

8707150171 870706
PDR ADOCK 05000250
S PDR

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			

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

EVENT

On June 5, 1987, with Unit 3 in mode 6 and Unit 4 in mode 5, it was discovered that neither unit had met the surveillance requirements of Technical Specification (TS) 3.10.8. This TS requires determination of the boron concentration of the reactor coolant system (RCS) and the refueling canal at least once per 72 hours while the unit is in mode 6 (refueling). For practical purposes, references to the refueling canal or to the reactor cavity are equivalent. Procedures NC-67, "Additional Chemistry Surveillance During the Refueling Cooldown and Shutdown", and OP 16002.6, "Preparations and Precautions for Refueling Fuel Shuffle", required sampling of the reactor cavity within 8 hours before moving the first fuel assembly and at least once per 8 hour shift while fuel is being moved. During periods of time when a unit was in mode 6 and no fuel was being moved, the boron concentration in the transfer canal was not being determined.

CAUSE OF EVENT

The surveillance became mandatory in License Amendments 114 and 108. These amendments were issued on June 27, 1985 and were scheduled to be implemented on August 25, 1985.

Two major contributing causes to the missed surveillances were identified. These are:

- 1) Failure to properly identify and implement the surveillance requirements upon the issuance of the License Amendments. The performance of the surveillances is the responsibility of the Chemistry department. The License Amendment was reviewed by this department, but the surveillance requirement was misinterpreted to mean that the reactor cavity was required to be sampled only during core alterations.
- 2) Inadequate review of the Technical Specifications during the revision of procedure AP 0190.16, "Scheduling and Surveillance of Periodic Tests and Checks Required by Technical Specifications". The review was limited to the surveillances identified in TS section 4. This resulted in no review of TS section 3, with the consequence that no verification of procedural implementation of the TS section 3 required surveillances was performed.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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					0 3	OF	0 3

TEXT (If more space is required, use additional NRC Form 368A's) (17)

ANALYSIS OF EVENT

The purpose of analysing the refueling canal boron concentration during mode 6 is to assure that a uniform boron concentration is maintained for reactivity control in the water volume having direct access to the reactor vessel. These limitations are consistent with the initial conditions assumed for the boron dilution incident in the safety analysis. The initiation of a dilution incident is sensed by the source range neutron monitors. Upon detecting a boron dilution incident, the operators take proper steps to terminate the incident. During the period following the issuance of License Amendments 114 and 108, no boron dilution incident occurred. Based on the above, the health and safety of the public were not affected.

CORRECTIVE ACTIONS

- 1) Technical Specification section 3 will be reviewed. The surveillances identified during this review will be incorporated into procedure AP 0190.16.
- 2) Procedure NC-67 will be revised to include the boron sampling of the reactor cavity when the reactor cavity is filled.

ADDITIONAL DETAILS

Similar occurrences: LER 250-86-027, 250-85-028, 250-85-001



L-87-280
10 CFR 50.73
JULY 6 1987


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

Gentlemen:

Re: Turkey Point Unit 3
Docket No. 50-250
Reportable Event: 87-19
Date of Event: June 5, 1987
Missed Surveillance of Refueling Canal Boron Concentration
Due to Inadequate Implementation of Technical Specification Amendment

The attached Licensee Event Report is being submitted pursuant to the requirements of 10 CFR 50.73 to provide notification of the subject event.

Very truly yours,


C. O. Woody
Group Vice President
Nuclear Energy

COW/TCG/pm

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant