

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8803030276 DOC. DATE: 88/02/26 NOTARIZED: NO DOCKET #  
 FACIL: 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251  
 AUTH. NAME AUTHOR AFFILIATION  
 HART, R. D. Florida Power & Light Co.  
 CONWAY, W. F. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 88-001-00: on 880129, operability requirements of Tech Spec 3.5.1 for steam generator 10-10 level reactor could not be met. Caused by procedural error. Setpoints of affected channels rechecked, calibr & procedure revised. W/880226 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5  
 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
	EDISON, G	1 1		
INTERNAL:	ACRS MICHELSON	1 1	ACRS MOELLER	2 2
	AEOD/DOA	1 1	AEOD/DSP/NAS	1 1
	AEOD/DSP/ROAB	2 2	AEOD/DSP/TPAB	1 1
	ARM/DCTS/DAB	1 1	DEDRO	1 1
	NRR/DEST/ADS7E4	1 0	NRR/DEST/CEB8H7	1 1
	NRR/DEST/ESB 8D	1 1	NRR/DEST/ICSB7A	1 1
	NRR/DEST/MEB9H3	1 1	NRR/DEST/MTB 9H	1 1
	NRR/DEST/PSB8D1	1 1	NRR/DEST/RSB 8E	1 1
	NRR/DEST/SGB 8D	1 1	NRR/DLPQ/HFB10D	1 1
	NRR/DLPQ/QAB10A	1 1	NRR/DOEA/EAB11E	1 1
	NRR/DREP/RAB10A	1 1	NRR/DREP/RPB10A	2 2
	NRR/DRIS/SIB9A1	1 1	NRR/PMAS/ILRB12	1 1
	REG FILE 02	1 1	RES TELFORD, J	1 1
	RES/DE/EIB	1 1	RES/DRPS DIR	1 1
	RGN2 FILE 01	1 1		
EXTERNAL:	EG&G GROH, M	5 5	FORD BLDG HOY, A	1 1
	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 4										DOCKET NUMBER (2) 0 5 0 0 0 2 5 1										PAGE (3) 1 OF 04		
TITLE (4) Technical Specification Limits Exceeded for Safety System Settings Due to Non-Conservative Acceptance Criteria in Plant Procedures																						
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)							
01	29	88	88	001	00	02	26	88	Turkey Point Unit 3						0 5 0 0 0 2 5 0							
									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)																				
1		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)								
POWER LEVEL (10)		20.405(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.71(c)								
11010		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)				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												
Randall D. Hart, Licensing Engineer										AREA CODE		310 5 21461-161519										
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																						
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs												
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR						
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)												<input checked="" type="checkbox"/> NO										

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

In the course of resolving a management on shift (MOS) concern, a review of instrument surveillance procedures for Technical Specification (TS) compliance was initiated. This review identified instances where the surveillance procedures for instrument channels would allow the channel to be left in a nonconservative setting. Although the setpoints for these channels were set as close as possible to the TS values, the procedures did allow for a tolerance around the specified value which would allow the channel to be left slightly on the nonconservative side of the TS required value. Because of the possibility of nonconservative settings, the actual setpoints of the affected channels were reviewed. On January 29, 1988, it was determined, based on these reviews, that the operability requirements of TS 3.5.1, Table 3.5-1 and 3.5-2, for steam generator low low level reactor trip could not be met. Because no other action statement is provided for this condition, TS 3.0.1 was entered requiring a unit shutdown. At this time a 24 hour relief from TS 3.0.1 was requested from and granted by the NRC. On January 30, 1988, the affected setpoints were recalibrated and within TS limits taking Unit 4 out of TS 3.0.1. Our investigation has determined that one or more of these procedure inadequacies resulted from an incorrect determination that the TS value was a nominal value which allowed application of a tolerance band.

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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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Turkey Point Unit 4	0   5   0   0   0   2   5   1	88	— 0   0   1	— 0   0	0   2	OF 0   4

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

EVENT:

On January 27, 1988, a Management on Shift (MOS) observer noted that certain procedure requirements did not seem to be consistent with the Turkey Point Technical Specifications (TS). The MOS observations were reviewed the next day and an action item was assigned to address the concern. In the course of resolving the concern, a review of instrument surveillance procedures for TS compliance was initiated. This review identified instances where the surveillance procedures for instrument channels would allow the channel to be left in a slightly nonconservative setting. Although the setpoints for these channels were set as close as possible to the TS values, the procedures did allow for a tolerance around the specified value which would allow the channel to be left slightly on the nonconservative side of the TS required value. . Because of the possibility of nonconservative settings, the actual setpoints of the affected channels were reviewed.

On January 29, 1988, it was preliminarily determined, based on these reviews, that during the last surveillance, four of nine channels for the low low steam generator (SG) level reactor trip and auxiliary feedwater (AFW) initiation signals were left slightly below the TS setpoint of greater than or equal to 15%. Because two of these channels affected one SG, the minimum channels operable requirements of TS 3.5.1, Table 3.5-1 and 3.5-2, could not be met. Because no other action statement is provided for this condition, TS 3.0.1 was entered at 1200 on January 29, 1988, necessitating the unit to be in hot standby (mode 3) within 7 hours. At this time, the NRC was contacted regarding the application of discretionary enforcement for the situation. After detailed discussions with the NRC, an extension of TS 3.0.1 requirements for 24 hours was granted to allow for recalibration of the affected setpoints. At 0210 on January 30, 1988, the affected setpoints were recalibrated and within TS limits taking Unit 4 out of TS 3.0.1.

CAUSE OF EVENT:

Our preliminary investigation has determined that one or more of these procedure errors resulted from an incorrect determination that the TS value was a nominal value which allowed application of a tolerance band. This tolerance band was set such that the setting could be left outside the TS limit.

ANALYSIS OF EVENT:

During this event, Unit 4 was at 100% power and Unit 3 was in cold shutdown (mode 5).

Each SG has three (3) level transmitters that feed the reactor protection system and auxiliary feedwater (AFW) initiation logics. The reactor trip and AFW automatic initiation logics for SG low low level is any 2 out of 3 channels indicating low low level on 1 out of 3 SGs.



## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

The data from the last surveillance showed that 3 channels were at 14.975% and 1 channel was at 14.95%. The as found settings of 2 channels on the 4B SG at 14.95% and 1 channel on the 4A SG at 14.925% fall within the allowable values (greater than or equal to 14%) provided by our NSSS vendor for the proposed upgrade TS. The current TS trip setpoint for SG low low level is greater than or equal to 15%.

The power range flux - low setting (less than or equal to 25% power) which provides protection during reactor startup can be manually bypassed when two out of four power range channels reach the P-10 setpoint (10% of rated thermal power). During a unit shutdown, three out of four power range channels reaching the P-10 setpoint automatically reinstates the trip function and enables the P-6 permissive to re-energize the source range channels. During normal power operation the power range flux - high setting (109% power, actual setpoint of 108% power) provides the reactor trip protective function on overpower condition. The P-10 permissive does not provide any protective functions during normal power operation.

One channel (N-42) of the power range P-10 setpoint was indicated to be set slightly higher than the TS limit (10% rated thermal power). The as found value of 10.5% falls within the allowable values provided by our NSSS vendor for the proposed upgrade TS.

Our current TS do not provide any action statements for this condition. The TS upgrade project submittal for Turkey Point provides action statements that require the setpoint to be readjusted if it exceeds the trip setpoint but is within the "allowable value", thus not requiring the channel to be declared inoperable. These actions statements are consistent with the standard technical specifications.

The "allowable value" is a nominal allowance for setpoint drift between calibrations and has been used in several plant specific standard technical specifications.

Besides the SG level channels and the P-10 setpoint discussed above, three other instruments had surveillance procedures which could have allowed nonconservative settings. Each of these instruments were reviewed to identify the as found condition of the channels. All of these were found to be in compliance with the current TS settings.

Based on the above, the health and safety of the public was not affected since the procedures acceptance criteria and the as found values fell within the "allowable value" which our NSSS vendor has determined to be bounded by calculations used in the Turkey Point safety analysis.

**CORRECTIVE ACTIONS:**

- 1) The setpoints of the affected channels were rechecked, calibrated and the as found values recorded. This action was completed within 24 hours of entering TS 3.0.1.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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TEXT (If more space is required, use additional NRC Form 365A's) (17)

- 2) The affected procedures which allowed the nonconservative setpoints are being revised to ensure that the acceptance criteria falls within the limits provided in the current TS.
- 3) The TS table of safety system setpoints is being revised as a part of the standard TS upgrade project. This revised table will provide the setpoints along with "allowable values" to be used for tolerance bands. The upgraded TS will help prevent this event from recurring.
- 4) Our NSSS vendor had been requested to reevaluate our current setpoints to provide the instrument errors and drift assumed in the safety analysis. This data will be used to ensure that the procedures are written to ensure compliance with our TS and safety analysis.

ADDITIONAL DETAILS:

The reactor protection system for Turkey Point was designed by Westinghouse.

Similar Occurrences: None







FEBRUARY 26 1988

L-88-100  
10 CFR 50.73

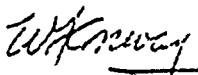
U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Unit 4  
Docket No. 50-251  
Reportable Event: 88-01  
Date of Event: January 29, 1988  
Technical Specification Limits Exceeded for  
Safety System Settings Due to Non-Conservative  
Acceptance Criteria in Plant Procedures

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

Very truly yours,

  
W. F. Conway  
Senior Vice President-Nuclear

WFC/SDF/gp

Attachment

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

SDF/015.LER

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