

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8808190083 DOC.DATE: 88/08/15 NOTARIZED: NO DOCKET #  
 FACIL:50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
 AUTH.NAME AUTHOR AFFILIATION  
 GROSS,K.W. Florida Power & Light Co.  
 CONWAY,W.F. Florida Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 88-014-00:on 880714,RCS leakage surveillance not performed within required interval due to personnel error.  
 W/8 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
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EDISON,G	1 1		
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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/ADS 7E	1 0	NRR/DEST/CEB 8H	1 1
NRR/DEST/ESB 8D	1 1	NRR/DEST/ICSB 7	1 1
NRR/DEST/MEB 9H	1 1	NRR/DEST/MTB 9H	1 1
NRR/DEST/PSB 8D	1 1	NRR/DEST/RSB 8E	1 1
NRR/DEST/SGB 8D	1 1	NRR/DLPQ/HFB 10	1 1
NRR/DLPQ/QAB 10	1 1	NRR/DOEA/EAB 11	1 1
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NRR/DRIS/SIB 9A	1 1	NUDOCS-ABSTRACT	1 1
REG FILE 02	1 1	RES TELFORD,J	1 1
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RES/DSR DEPY	1 1	RGN2 FILE 01	1 1
EXTERNAL: EG&G WILLIAMS,S	4 4	FORD BLDG HOY,A	1 1
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## 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 4					
TITLE (4) Reactor Coolant System Leakrate Surveillance Not Performed Within Required Interval Due to 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)	
																		Turkey Point Unit 4						0 5 0 0 0 2 5 1	
0 7		1 4		8 8		8 8		0 1 4		0 0		0 8		1 5		8 8								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) 1, 0, 0						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)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 368A)							
						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 Karl W. Gross, Compliance Engineer																TELEPHONE NUMBER AREA CODE 3 0 5 2 4 6 - 7 4 9									
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																									
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC															
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 July 14, 1988 a Quality Assurance Audit conducted to verify the implementation of Technical Specification 3.1, "Reactor Coolant System" identified two occasions in December of 1987 when RCS leakage was not determined within the required interval. The surveillances should have been performed within 24 hours plus or minus 6 hours. The intervals between actual performances were 35 hours, 42 minutes and 37 hours, 25 minutes. Existing plant procedures require either stabilized RCS conditions or a visual inspection for leakage. During both of the occurrences identified the unit was in the process of changing power levels which the operators believed precluded obtaining accurate results. The root cause of this event was personnel error by operators in delaying performance of the surveillance beyond the required interval. Corrective actions taken include a note placed in the night order book stressing the need to meet the 18 to 30 hour requirement identified by the Technical Specifications for conduct of the RCS Leakrate determination, evaluation of a third method for performance of RCS leak rate calculations and review of Technical Specifications for possible changes.

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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104  
EXPIRES: 8/31/88

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)				PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER				
Turkey Point Unit 3	05000250	88	014	00		02	OF	04

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

Event Description

On July 14, 1988 a Quality Assurance Audit conducted to verify the implementation of Technical Specification 3.1, "Reactor Coolant System" (RCS, EIIS Code AB), identified two occasions in December of 1987 when RCS leakage determination was delayed beyond the required interval.

Technical Specification (TS) Table 4.1-2, "Minimum Frequencies for Equipment and Sampling Tests", item 11, "RCS Leakage," lists a frequency of "Daily" for the interval for performance of RCS Leakage calculations. TS 4.0.1 allows specified intervals to be "adjusted plus or minus 25% to accommodate normal test schedules." Procedure 0-OSP-200.1, "Schedule of Plant Checks and Surveillances," requires procedures 3- and 4-OSP-041.1, "RCS Leak Rate Calculations" to be performed in all modes of operation on a "daily" basis. Procedure 0-OSP-200.1 defines daily as "at least once per 24 hours." Therefore with the application of the 25% rule, the appropriate interval between performances was between 18 and 30 hours, that is 24 hours plus or minus 6 hours.

On December 5, 1987, at 0325, Unit 4 was at approximately 50% power and was being ramped up to full power at a rate of 3% rated power per hour. A leak rate of - 0.23 gpm was obtained after a calculational duration of 37 minutes. To comply with the TS surveillance interval, the next leak rate calculation should have been completed on December 6 plus or minus six hours, i.e. no earlier than 2125 on December 5 and no later than 0925 on December 6. The first of two calculations completed on December 6 was not completed until 1503, resulting in an interval of 35 hours, 42 minutes. This exceeded the 30 hour maximum interval.

On December 21, 1987, Unit 3 was in mode 3 (Hot Standby) when its leak rate calculation procedure, 3-OSP-041.1, was completed at 0505 hours. The reactor was made critical at 0130 on December 22, 1987 and a power escalation begun. A leak rate should have been completed by 0505 hours on December 22, 1987 plus or minus six hours, i.e. no earlier than 2305 on December 21, and no later than 1105 on December 22. Instead, the calculation was not completed until 1230 on December 22, 1987, resulting in an interval of 37 hours and 25 minutes.

Cause of Event

The RCS leak rate procedures, 3- and 4-OSP-041.1, provide two methods for determination of RCS leakage. The first method is "RCS Leak Rate Calculation for Normal Parameter review" which requires the average reactor coolant system to be stabilized at 340 degrees F or greater, the reactor in modes 1 (Power Operation) through 4 (Hot Shutdown) and stabilized levels in the Volume Control Tank (EIIS system code CB and component code TK), the RCS Pressurizer (EIIS component code TK), the Pressurizer Relief Tank (EIIS component code TK), the Reactor Coolant Drain Tank (EIIS Component Code TK), and the containment sump (EIIS system code NH.) In addition, the operators are to "anticipate no load adjustments during the period of the test." The other option is for a "Containment Visual Inspection of the RCS" which requires authorization for containment access and compliance with health physics requirements for entry.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104  
EXPIRES: 8/31/88

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

Neither of these methods are ideal for periods during power level and load changes. The first is difficult to comply with due to the required stabilized levels, average temperature and restriction on load changes. The second is impractical due to health physics and ALARA concerns. During both of the occasions described above, power level and load changes were occurring.

The root cause of this event was cognizant personnel error by licensed utility operators, contrary to approved plant procedures. The appropriate action would have been to stabilize the plant and complete the required surveillance. The operators believed that more accurate results would be achieved by delaying performance of the procedure until a stabilized condition was reached.

Also, the operators were not fully aware that this delay would prevent compliance with the TS interval requirement.

#### Analysis of Event

The leak rate calculations were performed within a short period after stabilization of the RCS parameters. The leak rates determined were not indicative of a condition outside the TS limits or design basis for the plant. The belief that a more accurate calculation would be achieved by delaying test performance is indicative of the concern the operators held for achieving accurate information. Based on the above, the health and safety of the public was not effected.

This condition is reportable as a condition prohibited by the Technical Specifications.

#### Corrective Actions

- 1) A note was placed in the night order book stressing the need to meet the 18 to 30 hour requirement identified by the Technical Specifications for conduct of the RCS Leakrate determination. This was completed on August 3, 1988.
- 2) A third method for performance of RCS leak rate calculations during transient conditions is being developed. This would allow accurate determination during conditions similar to those described above. This method is forecast to be included into the surveillance procedure by September 30, 1988.
- 3) The Technical Specification applicable to Reactor Coolant System Leakage is under review for possible changes. This is being accomplished with the overall conversion of the Turkey Point Technical Specifications to a format similar to the Standard Technical Specifications. Recent draft versions under discussion with the Commission provide the needed operational flexibility to assure accurate results are achieved.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Turkey Point Unit 3	05000250	88	014	00	04	OF	04

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

Additional Information

Similar events involving delayed or missed surveillances were described in LERs 250-86-010, 250-86-013, 250-86-020, 250-86-027, 250-86-029, 250-87-025, 250-87-28, 250-88-006, 251-88-05, and 250-88-009.

The Turkey Point Reactor Coolant System was supplied by Westinghouse.

**FPL**

AUGUST 15 1988

L-88-348  
10 CFR 50.73

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

Gentlemen:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Reportable Event: 250-88-14  
Date of Event: July 14, 1988  
Reactor Coolant System Leakrate  
Surveillance Not Performed Within  
Required Interval Due to Personnel Error

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*

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

SDF3.LER

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