

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8811280064 DOC.DATE: 88/11/25 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 86-041-00:on 860201,residual heat removal pumps not in  
 operation as required by Tech Spec during refueling pool.  
 W/8 ltr.

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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 0 3																																	
TITLE (4) Residual Heat Removal Pumps Not in Operation as Required by Technical Specifications During Refueling Pool Fill Operation During Previous Refueling Outages																																																					
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 2			0 1			8 6			8 6			0 4			1			0 0			1 1			2 5			8 8			Turkey Point Unit 4												0 5 0 0 0 2 5 1											
0 2			0 1			8 6			8 6			0 4			1			0 0			1 1			2 5			8 8															0 5 0 0 0											
OPERATING MODE (9) 6									THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																																												
POWER LEVEL (10) 0 0 0									20.402(b)									20.405(e)									60.73(a)(2)(iv)									73.71(b)																	
									20.405(a)(1)(i)									60.38(c)(1)									60.73(a)(2)(v)									73.71(c)																	
									20.405(a)(1)(ii)									60.38(c)(2)									60.73(a)(2)(vii)									OTHER (Specify in Abstract below and in Text, NRC Form 368A)																	
									20.405(a)(1)(iii)									60.73(a)(2)(i)									60.73(a)(2)(viii)(A)																										
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LICENSEE CONTACT FOR THIS LER (12)																																																					
NAME Karl W. Gross, Compliance Engineer																				TELEPHONE NUMBER AREA CODE 3 0 5 2 4 6 - 6 7 4 9																																	
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																							
YES (If yes, complete EXPECTED SUBMISSION DATE)																				X NO																																	

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

On February 1, 1986 at about 0200, Turkey Point Unit 4 was in Mode 6, Refueling, when the RHR system was removed from operation during filling of the refueling cavity in accordance with procedures. This was contrary to Technical Specification (TS) 3.10.7, which requires two RHR loops to be operable and one loop to be in operation. This was identified on October 27, 1988. A review determined that Operating Procedure (OP) 16122 had not been revised in August 1985 when section 3.10 of the TS was amended. TS amendments 114/108 modified the requirement for operation of the RHR cooling loops. Prior to the amendments, the TS required one pump in operation when the reactor coolant temperature was greater than 160 F. Research determined that the RHR pumps were also not in operation on March 21, 1987. The cause of these events was an inadequate review of plant procedures to identify and assure that changes required to assure compliance with the revised Technical Specification were made. Corrective actions include Administrative Procedure (AP) 103.18, "Facility Operating License Amendments and/or Changes," which now formalizes the implementation of license amendments. Also, the Procedures Upgrade Program group performs specific reviews of license amendments to further assure that all required procedure changes have been implemented. Procedure OP 16122 was cancelled in February 1988. It was replaced by procedures 3(4)-OP-201, which have been/will be revised to address the concerns identified above.

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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (8)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Turkey Point Unit 3	0 5 0 0 0 2 5 0	8 6	0 4 1	0 0	0 2	OF	0 3

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

## Event Description

On February 1, 1986 at about 0200, Turkey Point Unit 4 was in Mode 6, Refueling, when the RHR system was removed from operation during filling of the refueling cavity in accordance with plant procedures. This was contrary to Technical Specification (TS) 3.10.7, which requires two RHR loops to be operable and at least one loop to be in operation. On March 21, 1987 at about 0040, Turkey Point Unit 3 was in Mode 6, Refueling, when the RHR system was removed from operation during filling of the refueling cavity. This was also contrary to TS 3.10.7. This is reportable in accordance with the requirements of 10CFR50.73(a)(2)(i) as a condition prohibited by the Technical Specifications.

These events were identified on October 27, 1988 during research of historical procedure content and implementation. The investigation was initiated as a result of a review of the revised refueling pool fill and drain procedure 4-OP-201, which was conducted prior to its use during the current Unit 4 refueling outage. Procedure 4-OP-201 was determined to require changes to assure full compliance with the TS. This resulted in questioning of historical practices and initiation of the investigation.

The review determined that Operating Procedure (OP) 16122 had not been revised in August of 1985 when section 3.10 of the TS was revised. Amendments 114/108 to the Turkey Point TS modified the requirement for operation of the RHR cooling loops. Prior to the amendments, the TS required one pump in operation when the average reactor coolant temperature was greater than 160 Fahrenheit. The revised TS requires one RHR cooling loop in operation and operable at all times, and another RHR cooling loop to be maintained operable when the refueling pool level is less than 23 feet above the reactor vessel flange. When OP 16122 was combined with other related procedures and reissued as procedures 3(4)-OP-201, the new procedures continued to allow the RHR system to be removed from service. These new procedures were not used prior to revision.

The RHR pumps were not in operation during the following periods:  
(Times are approximates based on Plant Supervisor - Nuclear logs)

## Unit 4.

1986 - February 1, 1986	0159 to 0230	(31 minutes)
	0247 to 0407	(1 hour, 20 minutes)

## Unit 3

1987 - March 21, 1987	0040 to 0110	(30 minutes)
	1439 to 1520	(41 minutes)
	1535 to 1625	(50 minutes)

## Cause of Event

The cause of this event was an inadequate review of plant procedures to identify and assure that changes required to assure compliance with revised Technical Specification 3.10.7 were made.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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	0 5 0 0 0 2 5 0	8 6	— 0 4 1	— 0 0	0 3	OF	0 3

TEXT (If more space is required, use additional NRC Form 306A's) (17)

**Evaluation of Event**

The RHR cooling loops provide decay heat removal from the fuel assemblies in the reactor vessel while the plant is in refueling mode. During the evolutions described above, the RHR system was temporarily aligned to transfer water into the refueling pool. While not capable of transferring heat from the core to the ultimate heat sink in this mode, the system did maintain the temperature of the fuel assemblies within the required range through addition of inventory to the refueling pool. This provided the required heat sink in the form of the additional specific heat capacity of the pool inventory. The RHR system was subsequently returned to service and normal RHR refueling mode heat removal restored. Based on this information, these events did not affect the health and safety of the public.

**Corrective Actions**

1. Administrative Procedure (AP) 103.18, "Facility Operating License Amendments and/or Changes," now requires that affected departments identify the procedure changes required by proposed TS changes prior to submittal for approval. The procedure also specifies that all identified changes be implemented at the time the change is implemented. This procedure formalizes the implementation of license amendments.
2. The Procedures Upgrade Program group performs specific reviews of license amendments to further assure that all required procedure changes have been implemented.
3. Procedure OP 16122 was cancelled in February 1988. It was replaced by procedures 3- and 4-OP-201. Procedure 4-OP-201 was revised on October 4, 1988 to address the concerns identified above. Procedure 3-OP-201 will be revised by November 30, 1988. Neither of the OP series procedures were/or will be used prior to revision to address the concerns identified.

**Additional Information**

No specific hardware deficiencies were identified.

Somewhat similar events related to inadequate procedure implementation of Technical Specification revisions have been reported in LERs 250-87-019, 250-86-019, 250-85-028, and 250-85-001.



FPL

P.O. Box 14000, Juno Beach, FL 33408-0420

NOVEMBER 25 1988

L-88-507  
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: 250-86-41  
Date of Event: February 1, 1986  
Residual Heat Removal Pumps Not in Operation as  
Required by Technical Specifications During Refueling  
Pool Fill Operation During Previous Refueling Outages

The attached License Event Report (LER) is being submitted pursuant to the requirements of 10 CFR 50.73 to provide notification of previous occurrences which were recently identified.

Very truly yours,

W. F. Conway  
Senior Vice President - Nuclear

WFC/RHF/gp

Attachment

cc: Malcolm L. Ernst, Acting Regional Administrator, Region II,  
USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant