

Region II
LICENSEE EVENT REPORT (LER)FACILITY NAME (1)
Turkey Point Unit 3DOCKET NUMBER (2)
0 5 0 0 0 2 5 0 1 OF 0 2

TITLE (4)

Fire Protection System - Flowpath Valve Surveillance

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)															
MONTH	DAY	YEAR	YEAR	SEQUENT-AL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)													
0	2	2	1	8	5	0	0	7	0	0	3	2	5	8	5	N/A	0	5	0	0	0	2	5	1

OPERATING MODE (9)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																								
N	<table border="1"><tr><td>20.402(b)</td><td>20.406(c)</td><td>60.73(a)(2)(iv)</td><td>73.71(b)</td></tr><tr><td>20.406(a)(1)(i)</td><td>60.36(c)(1)</td><td>60.73(a)(2)(v)</td><td>73.71(c)</td></tr><tr><td>20.406(a)(1)(ii)</td><td>60.36(c)(2)</td><td>60.73(a)(2)(vi)</td><td>OTHER (Specify in Abstract below and in Text, NRC Form 366A)</td></tr><tr><td>20.406(a)(1)(iii)</td><td>60.73(a)(2)(i)</td><td>60.73(a)(2)(vii)(A)</td><td></td></tr><tr><td>20.406(a)(1)(iv)</td><td>60.73(a)(2)(ii)</td><td>60.73(a)(2)(vii)(B)</td><td></td></tr><tr><td>20.406(a)(1)(v)</td><td>60.73(a)(2)(iii)</td><td>60.73(a)(2)(viii)</td><td></td></tr></table>	20.402(b)	20.406(c)	60.73(a)(2)(iv)	73.71(b)	20.406(a)(1)(i)	60.36(c)(1)	60.73(a)(2)(v)	73.71(c)	20.406(a)(1)(ii)	60.36(c)(2)	60.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)	20.406(a)(1)(iii)	60.73(a)(2)(i)	60.73(a)(2)(vii)(A)		20.406(a)(1)(iv)	60.73(a)(2)(ii)	60.73(a)(2)(vii)(B)		20.406(a)(1)(v)	60.73(a)(2)(iii)	60.73(a)(2)(viii)	
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20.406(a)(1)(iv)	60.73(a)(2)(ii)	60.73(a)(2)(vii)(B)																							
20.406(a)(1)(v)	60.73(a)(2)(iii)	60.73(a)(2)(viii)																							

LICENSEE CONTACT FOR THIS LER (12)
NAME
R. L. Teuteberg, Regulation and Compliance Engineer
TELEPHONE NUMBER
AREA CODE 3 0 5 2 4 5 1 2 9 1 0

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)
☐ YES (If yes, complete EXPECTED SUBMISSION DATE) ☒ NO
EXPECTED SUBMISSION DATE (15)
MONTH DAY YEAR

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

Event: The Turkey Point Technical Specifications require a monthly position verification and an annual cycling of each valve in the flowpath of the Fire Protection Water System to demonstrate the operability of the flowpath. As the result of a programmatic technical specification operability review, which is one of the short term objectives of the Turkey Point Program for Improved Operation, an evaluation of Technical Specification 3.14.2 and 4.15.2 for Fire Protection Systems concluded that plant procedures did not include all flowpath valves which should be periodically visually verified for position and functionally cycled.

Cause of Event: Prior to the recent technical specification operability review, plant procedures were written to address the operability of post indicator valves and root valves, yard fire hydrants, fire hose cabinets, and spray and/or sprinkler valves. This was considered satisfactory to meet the Fire Protection System operability requirements of applicable plant technical specifications, when these were developed in 1981. Since 1981, various Appendix R modifications have been made to the Fire Protection Water System which has changed the configuration of the system flowpath and added new valves. Appendix R requirements and modifications have placed a greater emphasis on the importance of fire protection systems to plant safety. As a result, to enhance the demonstration of the operability of the Fire Protection System, the recent technical specification operability review was performed from a more conservative standpoint. Of the 27 additional flowpath valves recently identified during the operability review, about one half are root valves for flowpaths which do not protect safety related areas. With the exception of 1 or 2 valves, the remaining are new flowpath valves recently installed for Appendix R modifications. Therefore, the identification of additional Fire Protection Water System flowpath valves resulted from both a more conservative evaluation of the operability requirements of technical specifications and the new valves added during Appendix R modifications.

Corrective Actions: See page 2.8504640402 850325
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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 5	— 0 0 7	— 0 0	0 2	OF 0 2

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

Corrective Actions:

- 1) The additional Fire Protection Water System flowpath valves have been identified, and on February 22, 1985, these valves were visually inspected and cycled in accordance with technical specification requirements.
- 2) The valves have been incorporated into the plant procedure AP 0103.19, Monthly Verification of Safety Related Systems Flowpaths.
- 3) These valves will also be incorporated into an existing maintenance procedure MP 15537.2, Fire Protection Equipment-Annual Surveillance, which will be revised to limit its scope to the existing requirements for cleaning and lubrication of valve stems for valves in the Fire Protection Water System flowpath. The surveillance cycling requirements will be removed from this maintenance procedure and incorporated into a new operations procedure.
- 4) In conjunction with revisions to MP 15537.2, a new plant operations surveillance procedure will be written to require the annual cycling of all system flowpath valves, including those recently identified during the operability review.

The health and safety of the public were not affected. Similar occurrences: None.



MAR 25 1985

L-85-123

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

Gentlemen:

Re: Reportable Event 85-07
Turkey Point Unit 3
Date of Event: February 21, 1985
Fire Protection System - Flowpath Valve Surveillance

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

Very truly yours,

J. W. Williams, Jr.
Group Vice President
Nuclear Energy

JWW/SAV/js

Attachment

cc: Dr. J. Nelson Grace
Harold F. Reis, Esquire
File 933.1
PNS-LI-85-119v

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