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ACCESSION NBR: 8903230293 DOC. DATE: 89/03/13 NOTARIZED: NO DOCKET #  
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
 AUTH. NAME AUTHOR AFFILIATION  
 MOWREY, C. Florida Power & Light Co.  
 CONWAY, W. F. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 89-004-00: on 890210, reactor trip due to defective  
 procedure during steam generator protection channel testing.  
 W/8 ltr.

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 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

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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) Reactor Trip Due to Defective Procedure During Steam Generator Protection Channel Testing																																						
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			1 0			8 9			8 9			0 0 4			0 0			0 3			1 3			8 9			N/A						0 5 0 0 0					
0 2			1 0			8 9			8 9			0 0 4			0 0			0 3			1 3			8 9									0 5 0 0 0					
OPERATING MODE (9) 2						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)						X						50.73(a)(2)(iv)						73.71(b)								
						20.405(a)(1)(i)						50.36(e)(1)												50.73(a)(2)(v)						73.71(e)								
						20.405(a)(1)(ii)						50.36(e)(2)												50.73(a)(2)(vi)						OTHER (Specify in Abstract below and in Text, NRC Form 365A)								
						20.405(a)(1)(iii)						50.73(a)(2)(i)												50.73(a)(2)(vii)(A)														
						20.405(a)(1)(iv)						50.73(a)(2)(ii)												50.73(a)(2)(vii)(B)														
20.405(a)(1)(v)						50.73(a)(2)(iii)												50.73(a)(2)(ix)																				
LICENSEE CONTACT FOR THIS LER (12)																																						
NAME Craig Mowrey, Regulation and Compliance Group																TELEPHONE NUMBER AREA CODE 3 0 5 2 4 6 - 6 9 7 1																						
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 10, 1989, at 1151, with Unit 3 reactor critical at 0% power (approximately 1 E -6 amps in the intermediate range) a reactor trip occurred. While performing procedure OP 14004.1 a bistable was placed in test causing the Reactor Protection System (EIIIS:JC) to see power level greater than 10%, enabling the P-7 reactor trips. P-7 is a trip permissive, enabled whenever either reactor power or turbine power is greater than 10%. This, coincident with the turbine trip signal from the unlatched turbine, caused the reactor trip. The cause of the trip was a defective procedure in that the step which resulted in the trip was not identified as having the potential to cause a trip. A contributing cause was inadequate control of procedure replacements which allowed two applicable procedures to be in effect at the same time. An event response team was formed to determine root cause(s) and corrective actions. The old procedure was revised to correct the errors and was completed to satisfy the surveillance requirement. The new procedures are being first-use verified, and work controls will be developed to ensure old procedures are cancelled in a timely manner.

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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	0 5 0 0 0 2 5 0	8 9	0 0 4	0 0	0 2	0 3

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

EVENT

On February 10, 1989, at 1151, with Unit 3 critical at 0% power (approximately 1 E -6 amps in the intermediate range), a reactor trip occurred. While performing procedure OP 14004.1, "Steam Generator Protection Channels - Periodic Test", Unit 3 tripped when bistable BS-3-446-1 was placed in the test position in accordance with step 8.3.72 of the procedure. This caused the Reactor Protection System (EIIIS:JC) to see a reactor power level of greater than 10%, enabling the P-7 reactor trips. P-7 is a trip permissive, enabled whenever either reactor power or turbine power is greater than 10%. The reactor then tripped due to the presence of the turbine trip signal (2/3 auto stop oil pressure). All systems functioned as designed; the plant was stabilized in Mode 3 (hot standby), and an Event Response Team (ERT) was convened to review the incident.

CAUSE OF EVENT

The ERT investigation into the event determined that the primary cause of the event was procedural inadequacy in that the caution regarding the potential for a reactor trip listed wrong applicable step numbers, was not placed directly before the applicable steps, and was generally confusing. Specifically the caution stated that it applies to steps 8.3.76 through 8.4.84 whereas it actually applies to steps 8.3.72 through 8.4.84. Additionally it was placed immediately preceding step 8.3.71 rather than immediately preceding step 8.3.72.

A contributing factor was that two applicable procedures, OP 14004.1 and 3-SMI-071.4, were in effect at the same time. As part of Turkey Point's Procedure Upgrade Program, procedure OP 14004.1 was to be replaced by 3-SMI-071.4, and six other new procedures. Plant policy allows continued use of the old procedure until the new procedure(s) have been first-use verified by a successful performance in the field. Although these new procedures had been approved and issued, they were not currently in use because they had not received their first-use test. New procedure 3-SMI-071.4 was written such that, had it been used, this trip would probably not have occurred. Since the seven new procedures had not been completed, the plant's schedule of surveillances still listed OP 14004.1 as the surveillance procedure.

ANALYSIS OF EVENT

A post-trip review was performed to assess the proper operation of safety-related equipment. The review established that there was no thermodynamic response to the trip and that plant parameters responded as expected. Other than the automatic initiation of the reactor trip, there were no manual or automatic

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
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Turkey Point Unit 3	0 5 0 0 0 2 5 0	8 9	0 0 4	0 0	0 3	OF	0 3

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

reactor protection system or engineered safety features actuations. Based on the above, the health and safety of the public were not affected.

CORRECTIVE ACTIONS

- 1) An ERT was formed to review the event and determine the root cause and corrective actions.
- 2) Procedure OP 14004.1 was revised to correct the errors, and the procedure was completed to satisfy the surveillance requirement.
- 3) The first-use test of the seven new replacement procedures will be performed and OP 14004.1 will be cancelled (six of the seven new procedures have been successfully completed on Unit 3). This action will be completed in time to support the restart of Unit 4, presently scheduled for April 8, 1989.
- 4) Work controls will be developed to ensure old procedures are cancelled in a timely manner after new upgrade procedures are approved. This action will be completed by June 1, 1989.

ADDITIONAL INFORMATION

Similar occurrences; LER 251-88-010 describes a reactor trip due to personnel error during the performance of OP 14004.1, and LER 250-86-030 describes a reactor trip and safety injection due to inadequate planning of post-maintenance testing associated with OP 14004.1.



MARCH 13 1989

L-89-92  
10 CFR 50.73

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

Gentlemen:

Re: Turkey Point Unit 3  
Docket Nos. 50-250  
Reportable Event: 250-89-04  
Date of Event: February 10, 1989  
Reactor Trip Due to Defective Procedure  
During Steam Generator Protection Channel Testing

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,

*DA Sage*

W. F. Conway  
Senior Vice President - Nuclear

WFC/RHF/gp

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

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