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RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 90-009-00:on 900519,breathing air containment isolation valve CV-3-6165 found pinned open while in Mode 3.
W/9 ltr.

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L-90-207
10 CFR 50.73

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

Gentlemen:

Re: Turkey Point Unit 3
Docket No. 50-250
Reportable Event: 90-09
Date of Event: May 19, 1990
Breathing Air Containment Isolation Valve CV-3-6165 Found Pinned Open While in Mode 3 (Hot Standby)

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

Very truly yours,

K. N. Harris
Vice President
Turkey Point Plant Nuclear

KNH/DRP/DWH/rat

attachment

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

IE22
1/1

NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

LICENSEE EVENT REPORT (LER)

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

TITLE (4) Breathing Air Containment Isolation Valve CV-3-6165 Found Pinned Open While In Mode 3 (Hot Standby)

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 5	1 9	9 0	9 0	0 0 9	0 0	0 6	1 1	9 0	N/A	0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9)	3
POWER LEVEL (10)	0 0 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

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)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
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	TELEPHONE NUMBER
David R. Powell, Licensing Superintendent	AREA CODE 3 0 5 — 2 4 6 - 6 5 5 9

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

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)

At 0610, on May 19, 1990, with Unit 3 in Mode 3 (Hot Standby), Breathing Air System Phase A containment isolation valve CV-3-6165 was discovered to be in the pinned open position. Valve CV-3-6165 must be pinned closed and locked prior to entering Mode 4 to meet the requirements of Technical Specifications 3.0.4 (Operational Mode changes), 3.3.1 (Containment Integrity), and 3.3.3 (Containment Isolation Valves). Unit 3 entered Mode 4 at 0535, on May 18, 1990. Valve CV-3-6165 was pinned closed and locked at 0627, on May 19, 1990. The root cause for failure to verify valve CV-3-6165 in the correct position prior to entering Mode 4 is inadequate procedural controls. Operating Surveillance Procedure 3-OSP-053.4, "Containment Integrity Penetration Alignment Verification," specified a normal valve position of "operable", which would be expected for valves receiving a containment isolation signal. However, to protect breathing air users, valve CV-3-6165 is pinned open when the Breathing Air System is in use to prevent inadvertent valve closure. On-The-Spot-Changes (OTSCs) have been prepared for procedures 3/4-OSP-053.4 specifying the correct normal valve position for valves CV-*-6165.

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

DESCRIPTION OF THE EVENT

At 0610, on May 19, 1990, with Unit 3 in Mode 3 (Hot Standby), a Reactor Control Operator (RCO) observed Control Room indication showing Breathing Air System containment isolation valve (EIIS:BD and LH, Component:ISV) CV-3-6165 in the open position. Valve CV-3-6165 is a Phase A containment isolation valve. However, to protect breathing air users, the valve is pinned open when the Breathing Air System is in use to prevent inadvertent valve closure. Valve CV-3-6165 should have been pinned closed and locked prior to entering Mode 4. Upon investigation, valve CV-3-6165 was verified to be in the pinned open position. At 0627, valve CV-3-6165 was placed in the correct position.

Technical Specification 3.3.1, "Containment Integrity," requires that primary containment integrity be maintained in Modes 1 through 4. Without primary containment integrity, containment integrity must be restored within one hour or the unit shall be placed in at least Hot Standby within the next 6 hours and in Cold Shutdown within the following 30 hours. Technical Specification Definition 1.5 states, in part, "Containment integrity shall exist when all penetrations required to be closed during accident conditions are closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions." Contrary to Technical Specification 3.3.1, valve CV-3-6165 was not in the correct normal valve position prior to entering Mode 4.

Technical Specification 3.3.3 states, in part, "The containment isolation valves for Phase "A" containment isolation, ... shall be operable with the isolation times of each power operated or automatic valve within the limits established for testing ..." When valve CV-3-6165 is open, it is pinned in the open position. Operability for valve CV-3-6165 is demonstrated by verification that it is in the pinned closed and locked position prior to entering Mode 4. Contrary to Technical Specification 3.3.3, valve CV-3-6165 was not in the correct normal valve position in Mode 3.

Technical Specification 3.0.4 states, in part, "Entry into an Operational Mode shall not be made unless the conditions for the Limiting Condition for Operation are met without reliance on provisions contained in the Action requirements." Unit 3 entered Mode 4 at 0535 on May 18, 1990. Containment isolation valve CV-3-6165 was in the pinned open position at that time. Therefore, containment integrity was not set prior to entering Mode 4 and was not maintained for approximately 24 hours and 52 minutes after entering Mode 4. This is contrary to Technical Specification 3.0.4 requirements.

CAUSE OF THE EVENT

The root cause for failure to pin close and lock valve CV-3-6165 prior to Unit 3 entering Mode 4 is inadequate procedural controls. On February 24, 1988, a Management on Shift (MOS) recommendation was made to review various procedures for possible elimination of unnecessary prerequisites required for mode changes. On May 20, 1988, General Operating Procedure 3-GOP-503, "Cold Shutdown to Hot Standby," was revised to remove a prerequisite for verifying the position of

valve CV-3-6165. This appeared to be a duplicate prerequisite since performance of Operating Surveillance Procedure 3-OSP-053.4, "Containment Integrity Penetration Alignment Verification," was also a prerequisite.

Procedure 3-OSP-053.4 was initially approved on July 2, 1987. The purpose of this procedure was to provide a listing of the containment boundaries and to provide a listing of valves to be verified in the correct position to ensure containment integrity prior to entering Mode 4. The normal valve position for CV-3-6165 was identified as being "operable."

The normal valve position of "operable" in 3-OSP-053.4 was assigned to valves receiving a containment isolation signal. Since valve CV-3-6165 is a Phase A containment isolation valve, the normal valve position of "operable" appeared correct. However, the version of Operating Procedure (OP) 15650, "Breathing Air System Operating Instructions," in effect on July 2, 1987 contained a precaution requiring valve CV-3-6165 to be closed, pinned, and locked prior to entering Mode 4. The Turkey Point Inservice Testing Program classifies valve CV-3-6165 as being passive and exempt from stroke time testing required by Technical Specification 3.3.3 as long as it is pinned closed and locked in Modes 1 through 4.

Therefore, had procedure 3-OSP-053.4 been reviewed against procedure OP 15650 during initial preparation, or had procedure 3-OSP-053.4 been verified to contain the same normal valve position as that being deleted from procedure 3-GOP-503, FPL believes the correct normal valve position would have been specified for valve CV-3-6165.

ANALYSIS OF THE EVENT

During the time valve CV-3-6165 was open, the Breathing Air System was in operation supplying greater than 90 psig of pressure. The downstream containment isolation check valve inside containment, 3-BA-201, was operable as demonstrated by Local Leak Rate Testing (LLRT) performed on February 5, 1990. A direct path from the inside of containment to the atmosphere did not exist.

CORRECTIVE ACTIONS

1. Valve CV-3-6165 was placed in the correct normal valve position.

2. On-The-Spot-Changes (OTSCs) have been generated to procedures 3/4-OSP-053.4 specifying the correct normal position for valves CV-3-6165 and CV-4-6165.

3. Procedure change requests have been generated to revise procedures 3/4-GOP-503. These revisions will add a prerequisite for verifying valves CV-3-6165 and CV-4-6165 are in the correct normal valve position prior to entering Mode 4. Procedures 3/4-GOP-503 will be revised by June 29, 1990.

4. Procedures 3/4-OSP-053.4 will be reviewed to verify that valves required to be "operable" prior to entering Mode 4 do not have any unique design features which would prevent closure upon receipt of a containment isolation signal. This review will be completed by June 30, 1990. Procedure changes will be initiated, if required.

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

ADDITIONAL INFORMATION

A similar event was reported in LER 50-251/83-012 and LER 50-251/83-012-01.