

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9208210047 DOC. DATE: 92/08/17 NOTARIZED: NO DOCKET #  
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light Co 05000250  
 AUTH. NAME AUTHOR AFFILIATION  
 KNORR, J. E. Florida Power & Light Co.  
 PLUNKETT, T. F. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-007-00: on 920716, discovered that valve & motor operator position for RWST outlet valve not verified when unit in Mode 3 or 6. Caused by less than adequate procedure. Checkoff procedure revised. W/920812 ltr.

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P.O. Box 029100, Miami, FL, 33102-9100

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L-92-225  
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: 92-007-00  
Missed Surveillance for MOV 3-864A and B and MOV 4-864A  
and B Valves and Power Breakers Open While Unit 4 or Unit  
3 Respectively Were in Mode 5 or 6.

The attached Licensee Event Report 250-92-007-00 is being  
provided in accordance with 10 CFR 50.73 (a)(2)(i)(B).

If there are any questions please contact us.

Very truly yours,

T. F. Plunkett  
Vice President  
Turkey Point Nuclear

TFP/JEK/jk

enclosures

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

200072

# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <b>TURKEY POINT UNITS 3 AND 4</b>	DOCKET NUMBER (2) <b>05000250</b>	PAGE (3) <b>1</b> OF <b>5</b>
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TITLE (4) **MISSED SURVEILLANCE FOR MOV 3-864A AND B and 4-864A AND B VALVES AND POWER BREAKERS OPEN WHILE UNIT 4 OR UNIT 3 RESPECTIVELY IS IN MODE 5 OR 6.**

EVENT DATE (5)			LER NUMBER (6)			RPT DATE (7)			OTHER FACILITIES INV. (8)		
MON	DAY	YR	YR	SEQ #	R#	MON	DAY	YR	NAME		DOCKET # (5)
07	16	92	92	007	00	08	17	92			

OPERATING MODE (2)	1	<u>10 CFR 50.73(a)(2)(i)(B)</u>
POWER LEVEL (10)	87	

## LICENSEE CONTACT FOR THIS LER (12)

James E. Knorr, Regulation and Compliance Specialist	TELEPHONE NUMBER
	305-246-6757

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

CASE	SYSTEM	COMPONENT	MANUFACTURER	SPARE	CASE	SYSTEM	COMPONENT	MANUFACTURER	SPARE

SUPPLEMENTAL REPORT EXPECTED (14)					EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES	(if yes, complete EXPECTED SUBMISSION DATE)							
					X			

ABSTRACT (16) On July 16, 1992, during an audit of Technical Specification 4.5.2, surveillance requirements, Quality Assurance personnel discovered that the valve and motor operator breaker position for a Refueling Water Storage Tank (RWST) outlet valve had not been verified as required when either Unit 3 or Unit 4 was in Mode 5 or 6. The root cause of the missed surveillance was inadequate procedures. Certain Emergency Core Cooling System configurations require that all the Unit 3 and Unit 4 RWST outlet valves be open with power removed from the operators if 3 of 4 Safety Injection Pumps are to be considered operable. The normal operating configuration for single or dual unit operation is the cross-connect valves closed between the Unit 3 and Unit 4 Safety Injection pump suction which requires both the Unit 3 and Unit 4 RWSTs to be operable. Procedures in place which control necessary surveillances to ensure RWST operability during operation did not include the specific verification, required by Technical Specifications, of valve or motor operator breaker positions for the tank outlet valves when one of the units was in Mode 5 or 6. Revisions of the procedures to ensure checks required by Technical Specifications are complete.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME	DOCKET NUMBER	LER NUMBER	PAGE NO.
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### I. DESCRIPTION OF THE EVENT

On July 16, 1992, an audit of Technical Specification 4.5.2, "ECCS Subsystems -  $T_{avg}$  Greater Than or Equal to 350°F", surveillance requirements was being performed. Technical Specification 4.5.2 requires the verification of the supply from the refueling water storage tank (RWST) (EIIS-BQ, Component-TK) to the emergency core cooling system (ECCS) (EIIS-BQ). The audit discovered that during certain plant system configurations and modes of operation procedures did not require the verification of the open position of RWST outlet valves (EIIS-BQ, Component-V) and the associated motor operator power breakers (EIIS-BQ, Component-BKR). This is to be accomplished each 12 hours by control room verification that RWST outlet valves MOV-3-864A and B and MOV-4-864A and B are in the open position with power to the valve operators removed. Valve position is indicated in the control room by amber status lights. Technical Specification 3.5.3 requires that for the Emergency Core Cooling System to be considered operable, 3 of 4 Safety Injection Pumps (EIIS, BQ, Component-P) must be operable. The normal operating configuration for single or dual unit operation is for the cross-connect valves (870A and B) (EIIS-BQ, Component-V) between the Unit 3 and Unit 4 Safety Injection pump suctions to be closed. This configuration requires both the Unit 3 and Unit 4 RWSTs to be operable. The Technical Specifications do allow single unit operation with only one RWST operable, but the single RWST/single unit operation configuration requires that the Safety Injection pump suction line cross-connect valves be open.

Operator log sheet procedures require the verification of valve position status lights (MOV-3-864A and B and MOV-4-864A and B) in the control room each 8 hour shift in Modes 1 through 4. These same log sheets further locally verify the position of these valves in the locked open position each 8 hour shift in Modes 1 through 6 and the verification of the motor operator power breakers for MOV-3-864A and MOV-4-864A in the locked open position for Modes 1 through 6. However, the log sheets required the verification of the motor operator power breakers for MOV-3-864B and MOV-4-864B only in Modes 1 through 4. In all cases the log sheets required a specific line item check for breaker and valve position verification.



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As a matter of procedure and plant policy these valves and their associated motor operator breakers are locked in the open position when required to be operable.

During the audit, Quality Assurance personnel discovered that the breaker position for power to the RWST outlet valves (MOV-3-864B or MOV-4-864B) had not been procedurally required to be verified when either Unit 3 or Unit 4 was in Mode 5 or 6 by a specific line item check-off. The audit also identified that the verification of valve position using the control room lights was not done in Modes 5 and 6 when required for the operability of 3 safety injection pumps in accordance with Technical Specification 3.5.2. The valve positions were confirmed on logs taken in the plant by local inspection of the locked open valves.

The audit identified the following days during which Unit 3 or 4 were in Mode 5 or 6 and the Safety Injection suction cross-connect valves were closed and the RWST outlet valve's (MOV 3-864B or MOV-4-864B) breakers were not specifically, by check-off, verified to be open:

- Unit 3 April 28, 1992 to May 3, 1992
- Unit 4 December 12, 1991 to December 16, 1991
- Unit 4 January 29, 1992 to January 31, 1992

These dates also apply to the lack of a control room verification of the opposite unit's valve position indication. However, the local verification of all valve positions was completed in the plant and documented on log sheets.

Each of the breakers for power to the valve operators for MOV-4-864B and MOV-3-864B is locked open and a record search verified that both breakers remained locked in the open position as required by Technical Specifications.

### II. CAUSE OF THE EVENT

The root cause of the missed surveillance was a less than fully adequate procedure. Procedures in place, which control necessary surveillances during operation, did not include specific line item verification of breaker positions for the RWST outlet valves when one of the units was in Mode 5 or 6. Procedures in place also did not verify valve position by use of control room indication. The procedures did require local valve position verification by inspection of the locked open valves.

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### III. ANALYSIS OF THE EVENT

Turkey Point Nuclear Plant Units 3 and 4 share four safety injection pumps (see sketch on Page 5). Unit 3 and Unit 4 each has a 320,000 gallon RWST. Each RWST is normally aligned to two safety injection pumps. The safety injection pumps have a common suction header with normally closed series cross-connect valves (870A and B). With the cross connect valves open, the pumps can draw water from either the Unit 3 or Unit 4 RWST. With these cross-connect valves closed, both RWSTs must be operable for 3 or 4 safety injection pumps to be considered operable. For single unit operation with the opposite unit in Mode 5 or 6, three safety injection pumps must be operable. To ensure this operability Turkey Point procedures required the verification of valve positions and breaker positions for valve operators. Specific line items were checked off in the logsheets each eight hour shift for Modes 1 through 4. However, for one of two series outlet valves for each RWST, the breaker position, and for all motor operated series outlet valves, control room indication verification of valve open position was not verified by the check-off of a specific line item for each valve. All 864 A and B RWST outlet valves were locally verified to be in the locked open position.

Administrative control of locks on the open breakers for the RWST outlet valve motor operators provides a high degree of assurance that the breakers have remained in the open position during the above dates. The RWST outlet valves also are maintained in the locked open position during operation and therefore provide the same high degree of confidence that the valves remain open. The keys for the locks on the breakers and valves are maintained in the control room under the administrative control of the Nuclear Plant Supervisor (NPS) or Assistant NPS. This key control requires a sign-out by the person requiring the key. In all cases each Unit 3 and Unit 4 RWST had sufficient borated water (greater than 320,000 gallons) and were considered operable.

All evidence shows that the valves and breakers remained in the open position, as required by Technical Specifications, during the dates that either Unit 3 or 4 was in Mode 5 or 6.



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### IV. CORRECTIVE ACTIONS

1. Revisions of the procedures to require a specific line item checking-off of the outlet valve motor operator breaker positions have been completed.
2. Procedures have been revised to ensure the RWST outlet valves are open by checking control room indicating lights.

### V. ADDITIONAL INFORMATION

The following LERs were filed during the past two years due to surveillances missed because of inadequate procedures.

250 LER 90-004 Surveillance test of Emergency Diesel Generator not completed.

