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ACCESSION NBR: 9208240031 DOC. DATE: 92/08/24 NOTARIZED: NO DOCKET #
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 AUTH. NAME AUTHOR AFFILIATION
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 PLUNKETT, T. F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-008-00: on 920723, discovered that analog channel operational test for overpressure mitigation sys did not check & adjust setpoint, per TS 4.4.9.3.1. Caused by inadequate procedure. Procedures revised. W/920814 ltr.

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AUG 14 1992

L-92-226
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: 92-008-00
Analog Channel Operational Test for Overpressure
Mitigation System Not in Accordance with Technical
Specifications

The attached Licensee Event Report 250-92-008-00 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

enclosure

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

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) TURKEY POINT UNITS 3 AND 4										DOCKET NUMBER (2) 05000250		PAGE (3) 1 OF 3	
TITLE (4) Analog Channel Operational Test for Overpressure Mitigation System Not in Accordance with Technical Specifications.													
EVENT DATE (5)				LER NUMBER (6)			RPT DATE (7)			OTHER FACILITIES INV. (8)			
MON	DAY	YR		YR	SEQ #	R#	MO N	DAY	YR		NAME		DOCKET # (S)
07	23	92		92	008	00	08	24	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)													
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	NPRDS			
SUPPLEMENTAL REPORT EXPECTED (14)								EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR	
YES	(if yes, complete EXPECTED SUBMISSION DATE)						NO						
							X						
ABSTRACT (16)													
<p>On July 23, 1992, during a procedure review, Turkey Point personnel discovered an Analog Channel Operational Test procedure deficiency. Technical Specification 4.4.9.3.1 requires an Analog Channel Operational Test of the Overpressure Mitigating System. This test requirement includes adjustments as necessary of alarms interlocks and/or trip setpoints. The method used at the time of discovery actuated a circuit which caused the pressurizer power operated relief valve to open. The procedure injected a simulated setpoint signal but did not check and adjust as necessary the set point for the Overpressure Mitigating System as required by the Technical Specifications. The cause of the deficiency was an inadequate procedure. The procedures for both Units 3 and 4 have been revised.</p>													

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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TURKEY POINT UNIT 3	05000250	92-008-00	02 OF 03

I. DESCRIPTION OF THE EVENT

On July 23, 1992, 3-OSP-041.4, "Overpressure Mitigating System Nitrogen Backup Leak and Functional Test," was reviewed to prepare for the upcoming outage. During the review, operations personnel identified that the procedure performed a functional test as required by Technical Specifications in affect prior to August 28, 1991. Technical Specifications in affect since August 28, 1991, require an Analog Channel Operational Test (ACOT). The definition for an ACOT includes "the injection of a simulated signal into the channel as close to the sensor as practicable to verify the operability of alarm, interlock and/or trip functions. The analog channel operational test shall include adjustments, as necessary, of the alarm, interlock and/or trip setpoints such that the setpoints are within the required range and accuracy."

The ACOT is required by Technical Specification to be done within 31 days prior to entering a condition in which the PORV (power operated relief valve) (EIIS-JC, Component-RV) is required to be operable and at least once per 31 days thereafter when the PORV is required to be operable. Contrary to the Technical Specification definition, testing done on the Overpressure Mitigating System (OMS) (EIIS-JC, Component-PA) only provided a zero voltage signal to one side of the pressure comparator circuit which artificially reduces the setpoint of the comparator to zero psig. The comparator is designed to send an open signal to the pressurizer PORVs when the system pressure is greater than the setpoint pressure based upon an OMS setpoint of 415 psig \pm 15 psig. The 415 psig setpoint is designed to be in affect at all times when OMS is activated and the Reactor Coolant System temperature is below 285°F. Since during the functional test the setpoint is artificially reduced to 0 psig, the alarm and trip setpoint have only been verified during calibration which is required by Technical Specifications each 18 months.

The following dates are those during which the respective units were taken to a temperature of less than 285°F and therefore by procedure required the operability of the OMS:

Unit 3 - April 29, 1992 to May 11, 1992

Unit 4 - January 28, 1992 to February 4, 1992
- December 11, 1991 to December 17, 1991

For each of these cooldowns and for the heatup following the dual unit outage in September and October of 1991 for Unit 3 and 4 respectively the OMS was placed in service using the inadequate functional test procedure.

II. CAUSE OF THE EVENT

The root cause of the inadequate Analog Channel Operational Test was an inadequate procedure. Procedures in place, which controlled the functional test did not provide for the test of the setpoints and adjustment as appropriate.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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III. ANALYSIS OF THE EVENT

Unit 3 and Unit 4 have PORVs which protect the reactor coolant system from overpressurization at reduced temperature. The Technical Specifications require the OMS to be operable any time the temperature is less than 275°F. To ensure operability, the Technical Specifications require an Analog Channel Operational Test. Initiation of the open signal to the PORVs comes from a pressure comparator which receives two signals; actual pressure from a pressure transmitter PT 403, and a signal which at a temperature less than 285°F is a constant 415 psig \pm 15 psig. Procedure 3/4-OSP-041.4, "Overpressure Mitigating System Nitrogen Backup Leak and Functional Test," was used to verify the functionality of the circuitry in opening the PORV but did not verify the setpoint of 415 psig for actuation. The test reduced the setpoint to essentially zero. Therefore any pressure input resulted in the opening of the PORV. Calibrations of the Unit 3 and Unit 4 channels had last been performed prior to the startups of the units during the Fall 1991. Each calibration has provided assurance that the setpoint is in the Technical Specification required range. The last time a calibration was completed on OMS for each unit was prior to startup following the dual unit outage in 1991. A review of the past few years of calibration as found data revealed that the channels would have been considered operable during an Analog Channel Operational Test if the test had checked the setpoints. Therefore there is a high degree of confidence that the setpoints have been at levels required by Technical Specifications.

IV. CORRECTIVE ACTIONS

1. Procedures, 3/4-OSP-041.4 were revised to incorporate analog channel operational tests on July 28, 1992.
2. Other Technical Specification required Analog Channel Operational Test procedures are being reviewed to ensure that each test will be completed in accordance with the ACOT definition.

V. ADDITIONAL INFORMATION

None.