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ACCESSION NBR: 9211030293 DOC. DATE: 92/11/04 NOTARIZED: NO DOCKET #  
 FACIL: 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251  
 AUTH. NAME AUTHOR AFFILIATION  
 KNORR, J.E. Florida Power & Light Co.  
 PLUNKETT, T.F. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-008-00: on 921005, lift of pressurizer PORV PCV-4-455C  
 & isolation of MOV-4-751 residual heat removal suction  
 overpressure mitigating sys surveillance occurred due to  
 personnel error. Specialist counselled. W/921028 ltr.

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NOTES: NRR RAGHAVAN, L

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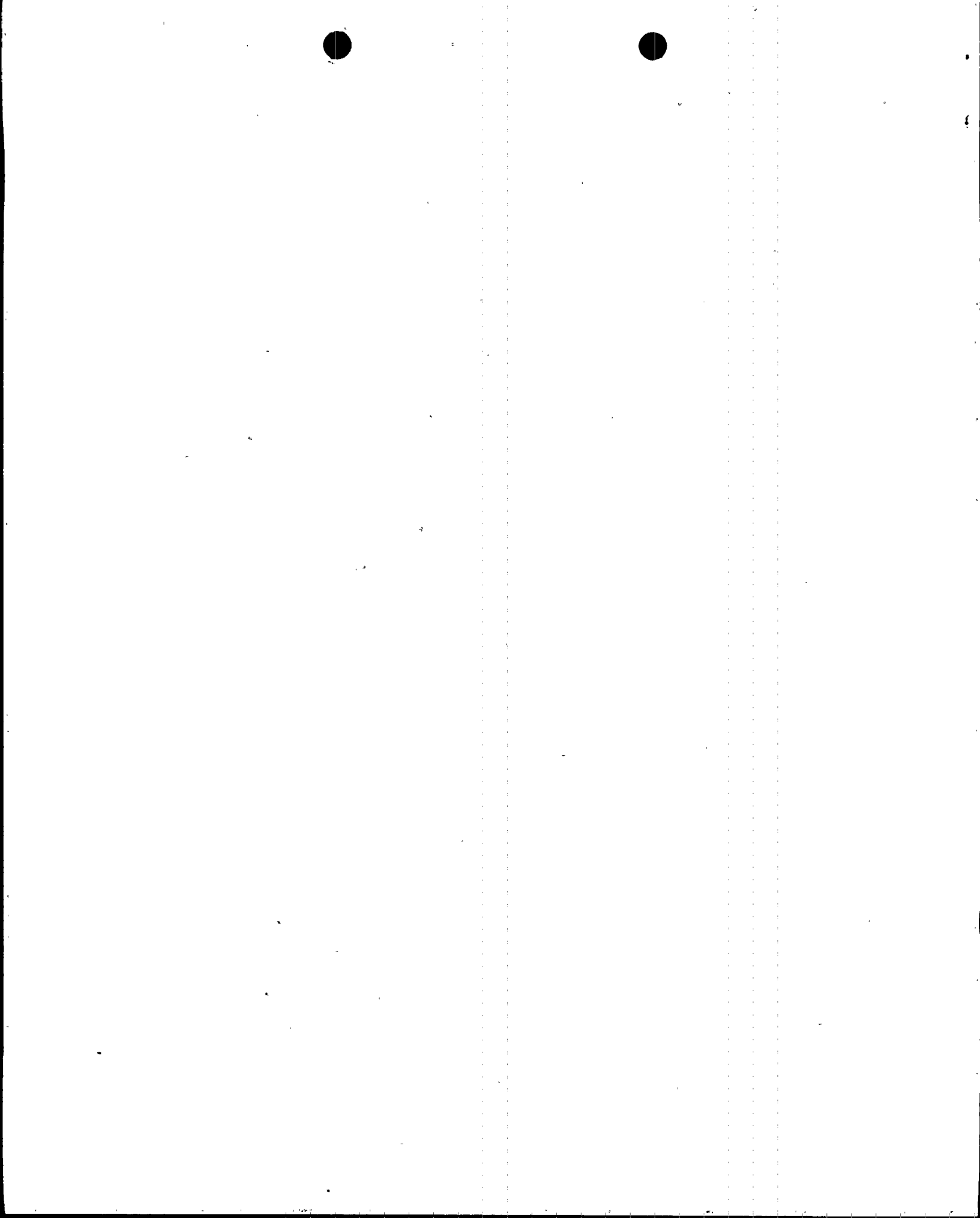
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OCT 28 1992

L-92-296  
10 CFR 50.73

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

Gentlemen:

Re: Turkey Point Unit 4  
Docket No. 50-251  
Reportable Event: 92-008-00  
Lift of Pressurizer PORV PCV-4-455C and Isolation of MOV-  
4-751 Residual Heat Removal Suction During Overpressure  
Mitigating System Surveillance.

The attached Licensee Event Report 251-92-008-00 is being  
provided in accordance with 10 CFR 50.73 (a) (2) (v).

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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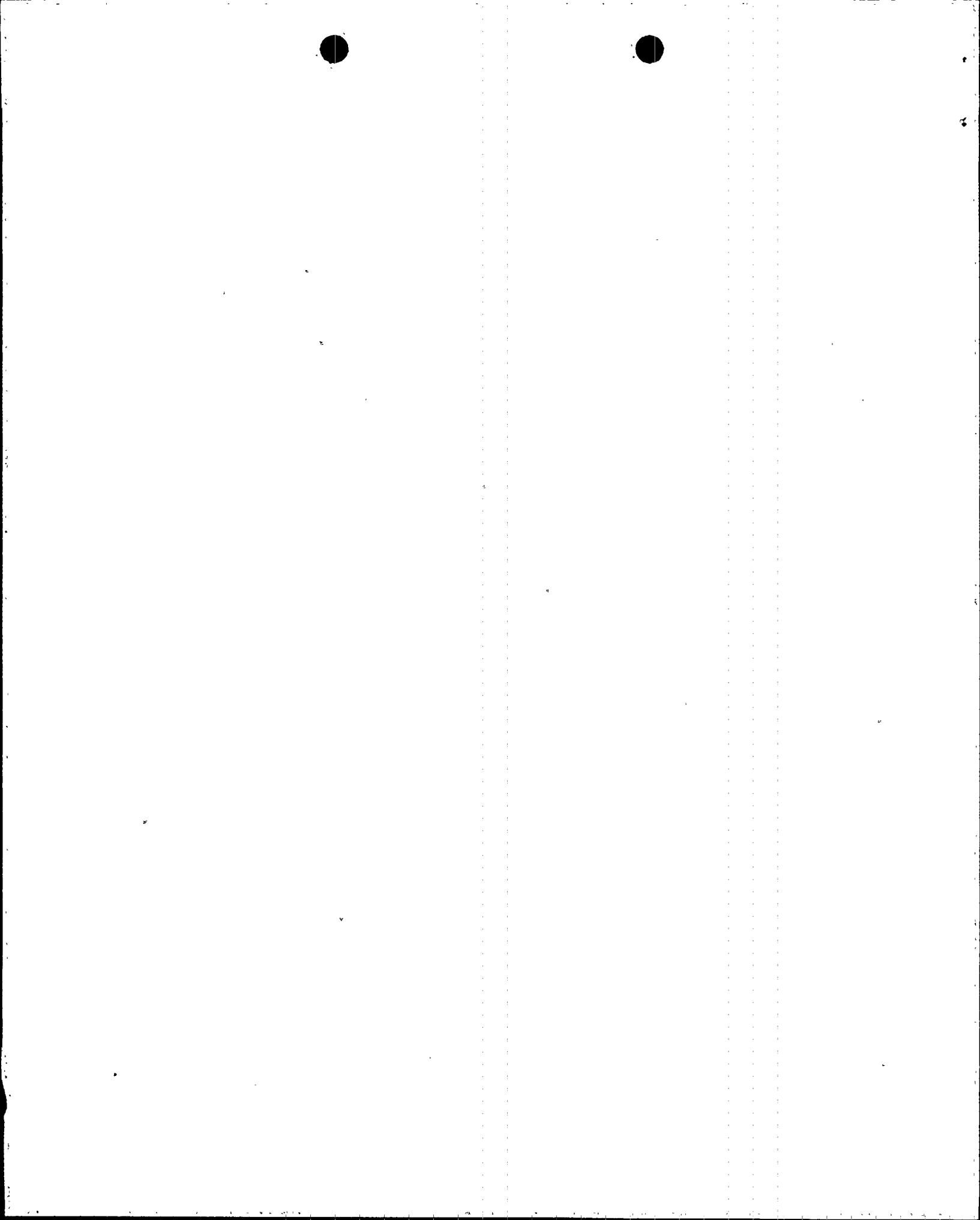
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PDR ADOCK 05000251  
S PDR

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# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <div style="text-align: center;">TURKEY POINT UNIT 4</div>										DOCKET NUMBER (2) <div style="text-align: center;">05000251</div>		PAGE (3) <div style="text-align: center;">1 OF 3</div>		
TITLE (4)      Lift of Pressurizer PORV PCV-4-455C and Isolation of MOV-4-751 Residual Heat Removal Suction During Overpressure Mitigating System Surveillance.														
EVENT DATE (5)			LER NUMBER (6)			RPT DATE (7)			OTHER FACILITIES INV. (8)					
MON	DAY	YR	YR	SEQ #	R#	MON	DAY	YR	FACILITY NAMES			DOCKET # (5)		
10	05	92	92	008	00	11	04	92	TURKEY POINT UNIT 3			05000250		
OPERATING MODE (9)		5		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § 10 CFR 50.73(a)(2)(v)										
POWER LEVEL (10)		0%												
LICENSEE CONTACT FOR THIS LER (12)														
James E. Knorr, Licensing Engineer										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)    NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>										EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
(if yes, complete EXPECTED SUBMISSION DATE)														
<p>ABSTRACT (16)</p> <p>On October 5, 1992, at 1158 EDT, performance of a Technical Specification required surveillance analog channel operational test of the Unit 4 overpressure mitigating system resulted in an opening of power operated relief valve PCV-4-455C and the closing of residual heat removal (RHR) pump suction valve MOV-4-751. Unit 4 was in Mode 5 at 178 °F and 354 psig. The pressurizer power operated relief valve was closed immediately after the event. During the event reactor coolant pressure decreased from 354 psig to 345 psig. Prior to the event, MOV-4-751 was open allowing residual heat removal flow of 3600 gallons per minute. During the event MOV-4-751 closed and was immediately reopened. Residual heat removal pump suction flow stopped with valve closure and returned to normal after the valve was reopened. The 'A' RHR pump was turned off upon loss of suction and the 'B' RHR pump was turned on to supply the flow after the valve was reopened. The reactor coolant system temperature rose 1 °F during the event. The cause of the event was personnel error. The controlling procedure was revised to reduce the probability of recurrence of this type of event.</p>														



# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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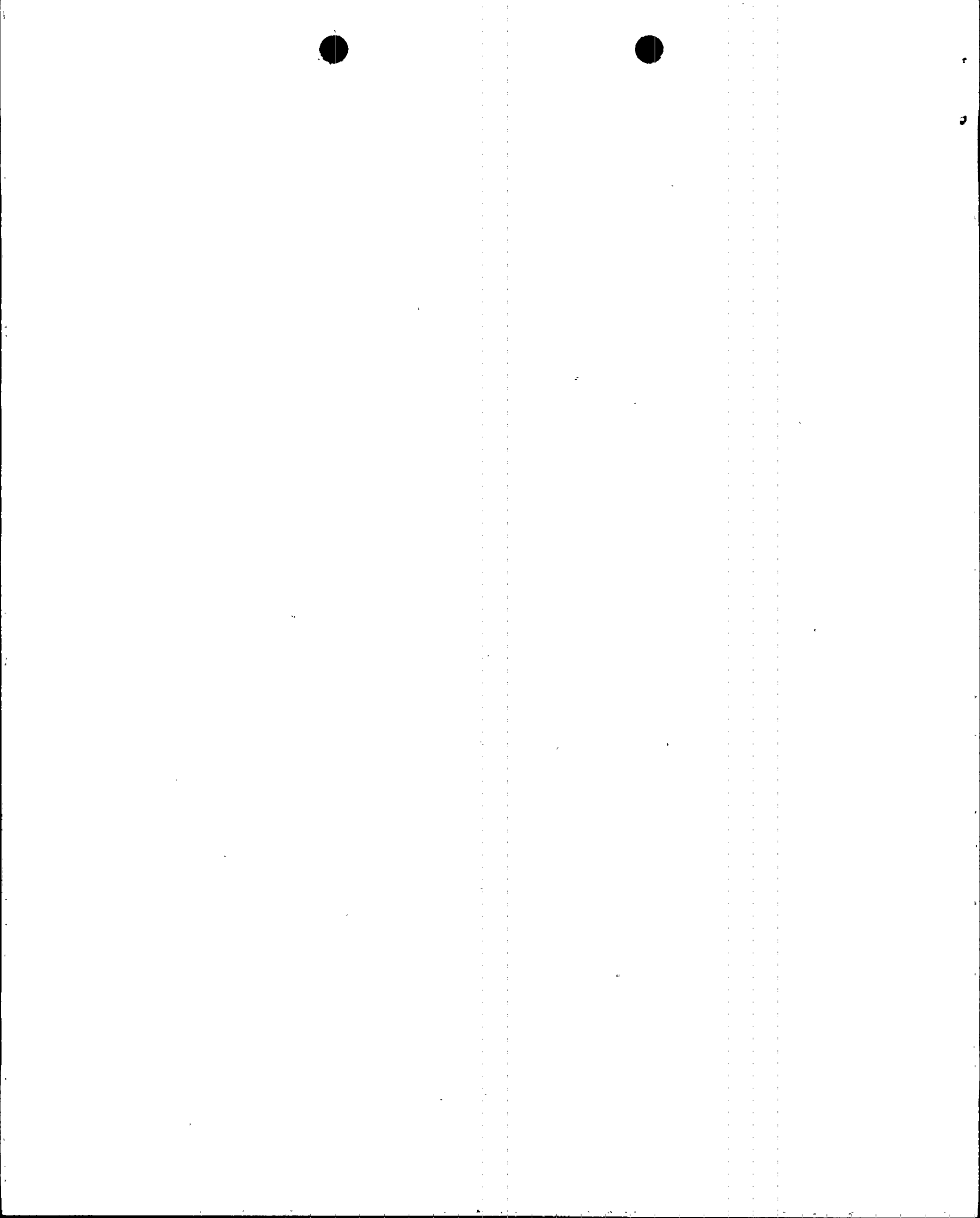
## I. EVENT DESCRIPTION

On October 5, 1992, at 1158 EDT, performance of a Technical Specification required surveillance analog channel operational test of the Unit 4 overpressure mitigating system (EIIS-AB) resulted in an opening of power operated relief valve PCV-4-455C (EIIS-AB) (IEEE-RV) and the closing of residual heat removal pump suction valve MOV-4-751 (EIIS-BP) (IEEE-V). Unit 4 was in Mode 5 at 178 °F and 354 psig. A pre-evolution briefing concerning the controlling procedure 4-OSP-041.4, Overpressure Mitigating System Nitrogen Backup Leak and Functional Test, was conducted between Instrumentation and Control (I&C) personnel and Operations personnel. The primary loop was prepared for the test to allow for the anticipated opening of the pressurizer power operated relief valve (PORV) PCV-4-456 without depressurization of the reactor coolant system and to provide a closure signal to the residual heat removal series suction valve MOV-4-750. The primary loop preparation included the closing of the block valve for PCV-4-456 (MOV-4-535) and the opening of the power breaker for MOV-4-750 to prevent closure of the valve and isolation of residual heat removal pump suction. The analog operational test of the pressurizer power operated relief valve is accomplished by the introduction of an artificial high pressure signal to the loop being tested and verification of the appropriate operation of the loop. After the pre-evolution briefing, the I&C specialist erroneously proceeded to apply an artificial high pressure signal to the backup loop (instead of the primary loop) of the overpressure mitigating system. The backup loop, which includes valves PCV-4-455C and MOV-4-751, is a parallel loop, identical in operation and configuration to the primary loop. Since the block valve for the backup loop pressurizer PORV was not closed, the introduction of the artificial high pressure signal opened the backup loop PORV, PCV-4-455C, resulting in the depressurization of the reactor coolant system. The PORV was immediately closed. During the event reactor coolant pressure decreased from 354 psig to 345 psig. MOV-4-751, which had been open prior to the event allowing residual heat removal flow of 3600 gallons per minute, closed during the event. MOV-4-751 was immediately reopened. The residual heat removal flow was reduced to no flow but returned to normal after the valve was reopened. The 'A' RHR pump was turned off upon loss of suction flow and the 'B' RHR pump was turned on to supply the flow after the valve was reopened. The reactor coolant system temperature rose 1.°F during the event.

This event was reported to the NRC operations center in accordance with 10 CFR 50.72(b) (2) (iii).

## II. EVENT CAUSE

The cause of this event was personnel error. 0-OSP-041.4 is a procedure under the control of Operations personnel. Verification of use of the correct portion of the procedure did not occur during the surveillance. During use of the procedure for the surveillance on the primary loop, I&C personnel used the wrong section of controlling procedure 4-OSP-041.4 to perform the introduction of the artificial high pressure signal.





# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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Specifically, procedure section 7.2.2.10 was performed rather than the required section 7.2.1.10. This resulted in the artificial high pressure signal introduction to the wrong loop.

## III. EVENT SAFETY ANALYSIS

The overpressure mitigating system is designed to limit the pressure to which the reactor coolant system is exposed during low temperature operation. During this event the system was actuated inadvertently resulting in a slight reduction in pressure and a 1 °F rise in temperature. No high system pressure actually occurred. The overpressure mitigating system and residual heat removal system responded as expected. After the event, the pressurizer power operated relief valve was closed and the residual heat removal system was returned to operation in a timely manner. Because of the short duration of the event only small changes in reactor coolant system parameters occurred. Therefore, the health and safety of plant personnel and the general public were not jeopardized by the actuation of the overpressure mitigating system.

## IV. CORRECTIVE ACTIONS

1. The specialist was counselled on the importance of care in the execution of procedures and disciplined in accordance with plant policy.
2. 3/4-OSP-041.4 was revised to require a verification of the appropriate block valve closed and power removed from the appropriate residual heat removal suction valve. This corrective action will reduce the probability of this type of event in the future.

## V. ADDITIONAL INFORMATION

No actuations of this type of the pressurizer power operated relief valve have occurred in the past.

This event was considered reportable in accordance with 10 CFR 50.73(a)(2)(v).

