

**LICENSEE EVENT REPORT**

EXHIBIT A

CONTROL BLOCK:										(PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)									
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100										1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100									
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(SEE ATTACHED SUPPLEMENTARY INFORMATION SHEET)

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SUPPLEMENTARY INFORMATION

Report Number: 50-302/80-001/01T-0  
Facility: Crystal River Unit #3  
Report Date: 14 January 1980  
Occurrence Date: 7 January 1980

Identification of Occurrence:

Ascension into an operational mode while in an action statement of a limiting condition for operation. This event is contrary to Technical Specification 3.0.4.

Conditions Prior to Occurrence:

Mode 1 power operation (100%)

Description of Occurrence:

At 1200 it was determined that the plant had entered into an operational mode while in an action statement of a limiting condition for operation. The plant entered into Mode 2 at 2348 on 5 January 1980 and ascended into power operation while pressurizer steam space sample isolation valve CAV-1 was declared inoperable.

Designation of Apparent Cause:

The cause of the event is attributed to personnel error. The event resulted from an extension of a previous interpretation of the intent of Technical Specification 3.0.4.

Analysis of Occurrence:

The penetration affected by the failure of CAV-1 was isolated as per the action statement requirements of Technical Specification 3.6.3.1; therefore, the health and safety of the public were not endangered as a result of this event.

Corrective Action:

A management meeting was held with the Plant Manager to review this event to prevent recurrence. A revision to Technical Specification has been submitted to the NRC with a request for expeditious review that will delete the requirements of Section 3.0.4 for selected containment isolation valves. Technical Specification change request #57 was submitted as follows:

- A. "For ACTION statements b and c of Specification 3.6.3, add a footnote to read: 'These valves may be reopened on an intermittent basis under administrative control for up to four (4) hours in any 24-hour period as necessary for sampling or surveillance testing'."
- B. Add ACTION statement e to read: "The provisions of Specification 3.0.4 are not applicable to those valves in Table 3.6-1 annotated

## Corrective Action: (Cont'd)

- B. by double asterisks (\*\*)." Double asterisks have been added to appropriate valves in Table 3.6-1.
- C. Add asterisk note to Table 3.6-1 to read: "May be opened on an intermittent basis under administrative control." Asterisks have been added to appropriate valves in Table 3.6-1.

REASON FOR THE PROPOSED CHANGE:

- A. ACTION statements b and c of Specification 3.6.3.1 require penetrations with one or more inoperable isolation valves(s) to be isolated. However, other specifications require cycling of the valves used to complete the isolation for either surveillance testing or to draw samples to complete required analyses. It is for this reason that the footnote has been proposed.
- B. ACTION e has been proposed for Specification 3.6.3.1 for valves that, if they are inoperable and ACTION Statement b or c is in effect, are in their post-containment isolation configuration. Since these valves are already in their post-containment isolation configuration, they neither perform an emergency core cooling function, nor offer any hindrance to normal plant operations while shut or isolated. There is no reason to restrain the entry into other OPERATIONAL MODES. Therefore, the exception to the provisions of Specification 3.0.4 is proposed.
- C. The Table note is being proposed to Table 3.6-1 because there are times in MODES 1,2,3, and 4 that it is necessary to cycle these manual valves to perform surveillance, draw samples, or support entry into the containment. Additionally, this note is currently included in B&W Standard (NUREG-0103, Rev. 3).

## Failure Data:

This is the second occurrence of this type reported. Reference LER 79-72.

/rc