

# Florida Power

CORPORATION

Crystal River Unit 3

Docket No. 50-302

November 10, 1994  
3F1194-09

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

Subject: Licensee Event Report (LER) 94-007-00

Dear Sir:

Attached is Licensee Event Report (LER) 94-007-00 which is submitted in accordance with 10 CFR 50.73.

Sincerely,

G. L. Boldt  
Vice President  
Nuclear Production

GLB/JAF:ff

Attachment

xc: Regional Administrator, Region II  
Project Manager, NRR  
Senior Resident Inspector

180010

## LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

Crystal River Unit 3 (CR3)

DOCKET NUMBER (2)

0 5 0 0 0 3 0 2 1 OF 0 5

PAGE (3)

TITLE (4) Personnel Error Leads to Failure to Perform Surveillance Resulting in Violation of Technical Specifications

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)													
1	0	1	2	9	4	9	4	0	0	7	0	0	1	1	1	0	9	4	0	5	0	0	0
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 50.71 (Check one or more of the following) (11)																					
1		20.402(b) 20.405(c) 50.73(a)(2)(iv) 73.71(b)																					
POWER LEVEL (10)		1 0 0 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)(vi) 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
J. A. Frijouf, Nuclear Regulatory Specialist	9 0 4 5 6 3 - 4 7 5 4

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input type="checkbox"/>	<input checked="" type="checkbox"/>				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On October 12, 1994, Florida Power Corporation's (FPC) Crystal River Unit 3 (CR-3) was in MODE ONE (POWER OPERATION), operating at 100% reactor power and generating 878 megawatts. While performing a general review of containment penetration data, FPC personnel identified two Reactor Building (RB) containment penetrations and their associated test taps which were not being properly surveilled. Failure to surveil these RB penetrations constitutes a violation of Technical Specifications (TS) and is reportable under 10CFR50.73(a)(2)(i).

A recent modification had installed flanges on both ends of the RB containment penetrations. Additionally, leak rate valves were installed on the ends of the penetrations located outside containment. Immediately after identifying the error, a verification was conducted that determined the RB containment penetrations had blind flanges installed and valves were closed and capped in compliance with TS. Additional corrective action to prevent recurrence has been implemented.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  Crystal River Unit 3 (CR3)	DOCKET NUMBER (2)  0 5 0 0 0 3 0 2 9 4 —	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		0 0 7	—	0 0 0 2	OF	0 5	

TEXT (If more space is required, use additional NRC Form 386A a) (17)

EVENT DESCRIPTION

On October 12, 1994, Florida Power Corporation's (FPC) Crystal River Unit 3 (CR-3) was in MODE ONE (POWER OPERATION), operating at 100% reactor power and generating 878 megawatts. At 0745, while performing a general review of containment penetration data, a questioning attitude led a FPC Nuclear Inservice Inspection (ISI) Specialist to identify two Reactor Building (RB) containment penetrations and their associated test taps which were not being properly surveilled.

In March 1994, a plant modification (see Figure 1) installed flanges on both ends of RB containment penetrations 216 and 217, which originally had sealed welded ends. Additionally, leak rate test valves LRV-130 and LRV-131 were installed on the penetrations located outside containment. The modification was placed in service in late May 1994. The purpose of the modification was to enable temporary power lines to be fed into the RB during extended outages. During plant operation, blind flanges are installed both inside and outside containment, and the valve outlets are capped.

Technical Specification (TS) 3.6.3, Surveillance Requirement 3.6.3.3 requires verification of closure for each containment isolation manual valve and blind flange that is located outside containment and is required to be closed during accident conditions. The surveillance frequency is every 31 days. Failure to surveil these RB penetrations constitutes a violation of TS and is reportable under 10CFR50.73(a)(2)(i).

At 0835, on October 12, 1994, immediately after identifying the omission, the ISI Specialist notified the Shift Supervisor On Duty (SSOD) of his findings. Together with a member of the operations staff and a representative of the engineering department, they verified that the RB containment penetrations located outside the RB had blind flanges installed and valves closed and capped in compliance with TS.

EVENT EVALUATION

TS 3.6.3, Surveillance Requirement 3.6.3.4 requires verification of closure for each containment isolation manual valve and blind flange that is located inside containment and is required to be closed during accident conditions. The surveillance frequency is prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days. On May 23, 1994, a MAR (Modification Approval Record) functional test was successfully performed on penetrations 216 and 217 in conjunction with performance of a type "B" containment leakage test which implements the requirements of 10CFR50 Appendix J, entitled "Primary Reactor Containment Leakage Testing for Water Cooled Power Reactors". At that time, both the inside and outside RB containment blind flanges were installed and their associated valves were verified to indicate them to be closed and capped in their TS required positions. During startup from the refueling outage, MODE 4 was

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  Crystal River Unit 3 (CR3)	DOCKET NUMBER (2)  0 5 0 0 0 3 0 2	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		94	007	94	03	OF	05

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

achieved on MAY 29, 1994, thus the "Appendix J" test satisfied the surveillance requirement for the blind flange on the penetrations located inside RB containment.

TS 3.6.3, Surveillance Requirement 3.6.3.3 requires verification of closure for each containment isolation manual valve and blind flange that is located outside containment and is required to be closed during accident conditions. The surveillance frequency is every 31 days. This surveillance was not performed during June through September 1994. On October 12, 1994, immediately after identifying the error, a verification of the RB containment penetrations was made. This verification determined that the flanges and valves located outside RB containment were closed in compliance with TS.

In a hypothetical worst case scenario, if the outside containment verification would have shown a mispositioned valve or flange to have been inoperable, TS Limiting Condition for Operation (LCO) 3.6.3, Condition A - Required Action states that the affected penetration must be isolated by means of installation of a blind flange, or other listed isolation device. Since a blind flange is already installed inside containment, no further action would have been necessary. Thus the failure to perform the TS required surveillance of the penetrations located outside RB containment did not constitute a safety or operability issue, but rather an administrative error. This event did not compromise the health and safety of the general public.

CAUSE

The root cause of this event was a cognitive personal error on the part of FPC engineering and operations personnel for failure to properly identify procedures requiring revision coincident with the installation of a plant modification.

CORRECTIVE ACTION

Since this event has the same root cause as that of a previously reported event (LER 94-004-00, dated August 17, 1994), three of the corrective actions to prevent recurrence developed for that event are also applicable to this event. Since the current event occurred prior to implementation of the corrective actions for LER 94-004-00, the corrective actions were not in place to prevent this event, but are expected to prevent future recurrence.

The corrective actions implemented by LER 94-004-00 and applicable to this event include the following:

1. A standardized MAR (Modification Approval Record) and FCN (Field Change Notice) review program has been included in the Systems Engineering Manual. This process documents the method in which engineering

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  <b>Crystal River Unit 3 (CR3)</b>	DOCKET NUMBER (2)  0 5 0 0 0 3 0 2	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 4	— 0 0 7	— 0 0	0 4	OF	0 5

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

personnel review MAR/FCN documents to assure affected procedures are identified for revision.

2. A review and evaluation will be performed by Quality Programs personnel to determine the process each department uses when reviewing MAR/FCN impact on procedures for which they are responsible.
3. Human Performance Evaluation System (HPES) studies will be conducted as appropriate to determine if additional corrective actions are required.

Specific corrective actions for this event include the following:

4. Compliance with TS was immediately verified for valves LRV-130 and LRV-131 and the associated blind flanges located outside the RB at RB penetration: 216 and 217.
5. An identification, review and revision, as applicable, of the of the procedures impacted by the addition of LRV-130 and LRV-131 at penetration 216 and 217 respectively will be conducted.

#### PREVIOUS SIMILAR EVENTS

There have been two previous reportable events in which RB containment penetration surveillances were not performed as required due to inadvertent omission from the surveillance procedure.

#### ATTACHMENT

Figure 1 illustrates the RB Containment Penetration before and after modification.

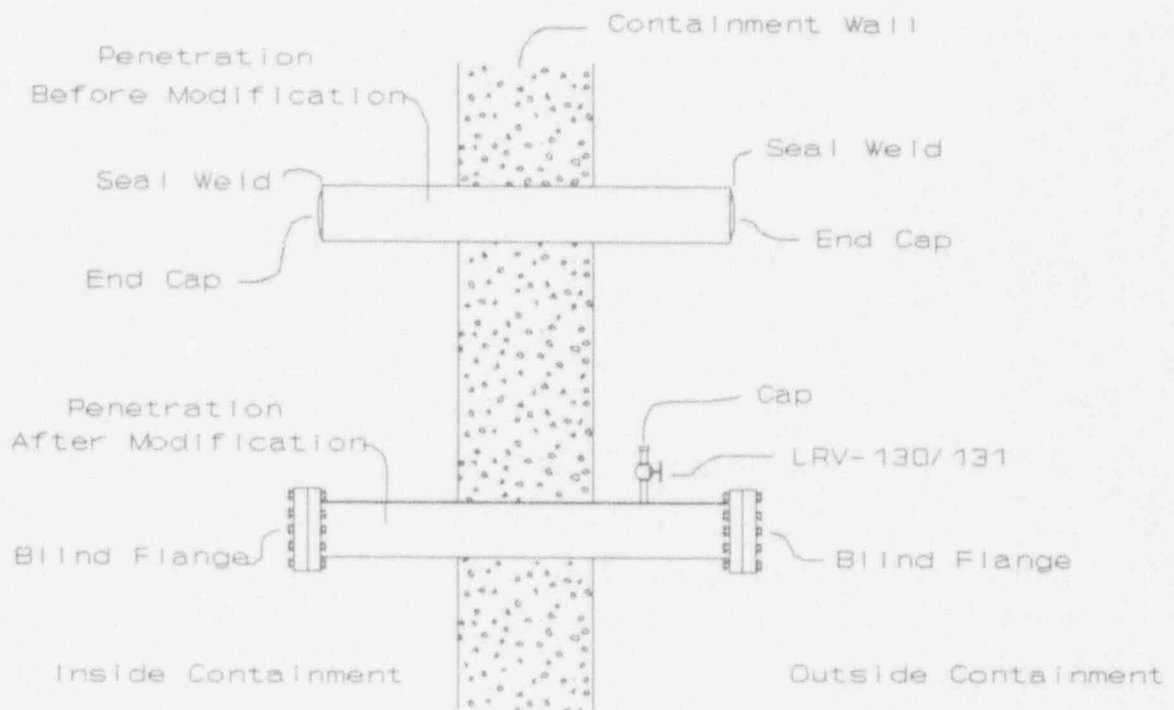
LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  Crystal River Unit 3 (CR3)	DOCKET NUMBER (2)  0 5 0 0 0 3 0 2	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 4	- 0 0 7	- 0	0 0 5	OF	0 5

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

FIGURE 1



RB CONTAINMENT PENETRATION