

## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <b>Turkey Point Unit 3</b>										DOCKET NUMBER (2) <b>0 5 0 0 0 2 5 0</b>					PAGE (3) <b>1 OF 0 2</b>	
TITLE (4) <b>Technical Specification - Snubbers</b>																
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)			
									N/A				0 5 0 0 0			
0 4	0 1	8 5	8 5	0 0 9	0 0 0 5	0 1	8 5		N/A				0 5 0 0 0			
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)														
N		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)		
POWER LEVEL (10)		20.405(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.71(c)		
0 0 0		20.405(a)(1)(ii)				50.36(c)(2)				50.73(a)(2)(vii)				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						
R. D. Hart, Licensing Engineer										AREA CODE 3 0 5 2 4 5 - 2 9 1 0						
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						
X	WI	SINB	P 0 2 9	N												
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)												X NO				

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

**Event:**

On April 1, 1985, while Unit 3 was proceeding to refueling shutdown conditions, it was determined that an evaluation required by Technical Specification (TS) was not done within the allowable time limits. On December 18, 1984, and March 16, 1985, a mechanical shock arrestor (snubber) on the steam generator (SG) blowdown system was replaced. On March 20, 1985, a subsequent examination of the replaced snubbers revealed that the snubbers were inoperable and that this condition appears to have existed at the time of replacement but had not been identified. If a snubber is found to be inoperable, TS required that snubber to be repaired or replaced and an evaluation to be performed on the supported components within 72 hours. The snubbers were replaced within the 72 hour time limit but no evaluation was performed at that time and the SG blowdown system was not declared inoperable.

**Cause of Event:**

The cause of the event was that the as found condition of the snubbers was not adequately evaluated, and the SG blowdown system was maintained operable.

**Corrective Actions:**

Corrective Actions include the following:

- 1) Upon determination that the snubbers were inoperable, the evaluation required by TS was performed for both occurrences. The results showed no adverse affects on the SG blowdown system occurred due to the condition of the snubbers.
- 2) New plant procedures have been written to enhance the performance of snubber functional testing, visual examinations, and surveillances.
- 3) Appropriate administrative site procedures used by construction personnel will be reviewed and revised to enhance the methods used to remove, test, and visually examine snubbers.
- 4) Discussions were held with the cognizant individuals on the significance of their actions and the need to adequately inspect snubbers prior to their removal.

The health and safety of the public were not affected. Similar occurrences: LER 251-83-005.

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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 9/31/85

FACILITY NAME (1)  Turkey Point Unit 3	DOCKET NUMBER (2)  0 5 0 0 0 2 5 0 8 5 — 0 0 9 — 0 0	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
					0 2	OF	0 2

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

**Event:**

On April 1, 1985, while Unit 3 was proceeding to refueling shutdown conditions, it was determined that an evaluation required by Technical Specification (TS) 3.13.3 for inoperable mechanical shock arrestors (snubbers) was not completed within the allowable time limits. On December 18, 1984, and March 16, 1985, the snubber at tag location number 34 on the steam generator (SG) blowdown system was found to have broken end cap screws. A non-conformance report (NCR) was written in both instances and the disposition of each NCR was to replace the snubbers.

On March 20, 1985, the replaced snubbers were examined further and determined to be inoperable. This condition appears to have existed at the time of replacement but had not been identified. When a snubber is inoperable, TS 3.13.3 states that within 72 hours replace or restore the inoperable snubber(s) to operable status and perform an evaluation per TS 4.14.3 on the supported component(s) or declare the supported system inoperable and follow the appropriate specifications for that system. The snubbers were replaced within the 72 hour time limit but no evaluation was performed at that time, and the SG blowdown system was not declared inoperable.

**Cause of Event:**

The cause of the event was that the as found condition of the snubbers was not adequately evaluated, and the SG blowdown system was maintained operable.

**Corrective Actions:**

Corrective actions taken include the following:

- 1) A subsequent evaluation was performed on the components which are attached to the snubbers. The purpose of the evaluation was to determine if the components supported by the snubbers were adversely affected by the inoperability of the snubbers in order to ensure that the supported components remain capable of meeting the designed service. The results of this evaluation showed that the condition of the snubbers had no adverse effects on the SG blowdown system.
- 2) Administrative Procedure (AP) 0190.83, "Mechanical Shock Arrestor Surveillance Program", AP 0190.85, "Functional Testing of Mechanical Shock Arrestors", and Operating Procedure (OP) 0209.9, "Visual Examination of Mechanical Shock Arrestors", have been written to enhance the removal, testing and surveillance of snubbers as required by TS and ASME Section XI. These procedures clarify the steps to be taken before removing or replacing a snubber and what actions should be taken based on functional testing of a snubber.
- 3) Appropriate administrative site procedures used by construction personnel will be reviewed and revised to enhance the removal, testing, and visual examination of snubbers.
- 4) Discussions were held with the cognizant individuals on the significance of their actions and the need to adequately inspect snubbers prior to their removal.



MAY 1 1985

L-85-170

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

Gentlemen:

Re: Reportable Event 85-009  
Turkey Point Unit 3  
Date of Event: April 1, 1985  
Technical Specification -  
Snubbers

The attached Licensee Event Report is being submitted pursuant to the requirements of 10 CFR to provide notification of the subject event.

Very truly yours,

A handwritten signature in dark ink, appearing to read "J. W. Williams, Jr.", with a stylized flourish at the end.

J. W. Williams, Jr.  
Vice President  
Nuclear Energy Department

JWW/JA/awt/T14:5

Attachment

cc: Dr. J. Nelson Grace  
Harold F. Reis, Esquire

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