

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302

May 20, 1996
3F0596-25

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Subject: Licensee Event Report (LER) 96-014-00

Dear Sir:

Please find the enclosed Licensee Event Report (LER) 96-014-00. This report is submitted by Florida Power Corporation in accordance with 10 CFR 50.73.

Sincerely,

B. J. Hickle, Director,
Nuclear Plant Operations

Attachment

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

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EXPIRES 5/31/95

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HOURS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (ANBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON DC 20503.

FACILITY NAME (1)

CRYSTAL RIVER UNIT 3 (CR-3)

DOCKET NUMBER (2)

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PAGE (3)

TITLE (4)

ISI Program Omission Causes Late Inspections Resulting in Failure to Meet CR-3 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)														
0	3	2	5	9	6	9	6	0	1	4	0	0	0	5	2	0	9	6	N/A	0	5	0	0	0
OPERATING MODE (9)		6		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (CHECK ONE OR MORE OF THE FOLLOWING) (11)																				
POWER LEVEL (10)		0		0		0		20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)										
				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)(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)(ix)																

LICENSEE CONTACT FOR THIS LER (12)

NAME

L.V. Cecilia, Nuclear Project Engineer

TELEPHONE NUMBER

AREA CODE

3 5 2 5 6 3 - 4 5 4 6

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

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

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)

On March 25, 1996, Florida Power Corporation's (FPC) Crystal River Unit 3 (CR-3) was in MODE SIX (Refueling). FPC personnel were performing Inservice Inspection (ISI) Program examinations as part of the Refuel 10 outage. At that time, it was discovered that CR-3 had failed to perform ASME Section XI, Category B-K-1 examinations during the second 10-year ISI interval. On April 19, 1996, it was recognized that the deferral of those examinations to the end of the interval was not permitted by the ASME Code and this was a violation of CR-3 Technical Specification (TS) 5.6.2.8. The event was re-evaluated as reportable on April 19, 1996. The cause of the event was personnel error for failing to include B-K-1 examinations in the ISI Program. This programmatic error was not detected promptly due to inadequate program controls. FPC inspected all required B-K-1 welds during the Refuel 10 Outage with no indications identified. Additional actions for this event include: a review of the ISI program to identify other potential omissions from the ISI Program, a review of the vendor technical information review procedure for adequacy, a revision of the ISI Program administrative controls and adding provisions for training and qualification of the ISI Program Manager.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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CRYSTAL RIVER UNIT 3 (CR-3)

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

EVENT DESCRIPTION

On March 25, 1996, Florida Power Corporation's (FPC) Crystal River Unit 3 (CR-3) was in MODE SIX (Refueling). FPC personnel were performing ISI examinations as part of the Refuel 10 ISI Program required work. At that time, it was discovered by the ISI Program Manager that CR-3 had failed to perform Category B-K-1 examinations during the Second 10-year ISI Interval as required by ASME Section XI, Table IWB-2500-1. As soon as the omission in the Inservice Inspection (ISI) Program was discovered the examinations were performed (all examinations were completed by April 4, 1996). On April 19, 1996 it was recognized that ASME Section XI, 1983 Edition does not permit the deferral of B-K-1 examinations to the end of the 10-year interval. It was then determined that CR-3 had violated Technical Specification 5.6.2.8 relative to ISI requirements. The nature of the violation was failure to perform a surface examination of 16-34% of the integrally welded attachments during the first inspection period (40-month periods are established by ASME Section XI, Paragraph IWB-2412), 50-67% by the end of the second inspection period and the balance during the third inspection period. This report is submitted in accordance with 10 CFR 50.73(a)(2)(i)(B) to describe a condition outside plant Technical Specifications.

Technical Specification (TS) 5.6.2.8, "Inservice Inspection Program" requires that the Program include provisions for the examination of ASME Code Class 1, 2 and 3 components and that they are performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50.55a.

EVENT EVALUATION

The update of the CR-3 Inservice Inspection Program to the ASME Code, Section XI, 1983 Edition through Summer of 1983 Addenda was performed in March 1987. At this time, Section IWF of the ASME Section XI Code was included within the scope of the ISI Program. Piping isometric sketches locating the supports (hangers) and their individual ASME inspection numbers were developed. These sketches also included the unique ASME identification number for the integral attachment welds (category B-K-1), where applicable. Subsequent NRC approval of ASME Code Case N-491 for inspection of supports resulted in the removal of the piping isometric sketches from the ISI Program. Both the supports and B-K-1 unique inspection numbers appear to have been deleted from the ISI program at this time. The sketches were then turned over to a vendor who was contracted to develop the new Component and Pipe Support manual. The scope of ASME Code Case N-491 does not address ASME Inspection Category B-K-1. As such, the vendor recommended at the completion of the Component and Pipe Manual, that the ASME Inspection Category B-K-1 welds be re-included in the ISI manual. This activity did not occur due to inadequate administrative controls.

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)
CRYSTAL RIVER UNIT 3 (CR-3)		YEAR SEQUENTIAL NUMBER REVISION NUMBER	
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TEXT (If more space is required, Use additional NRC Form 366A's (17))

The omission of the B-K-1 welds was not discovered until a review of ASME, Section XI ISI Program was performed during Refuel 10. The omitted examinations consisted of 10 Class 1 integrally welded attachments on various Class 1 piping systems (see tag numbers listed in Attachment 1). Each of these integrally welded attachments consists of a system of support lugs (number of lugs varies) welded to the outside surface of Class 1 piping. Each support lug (see Attachment 2 for a typical configuration sketch) is welded to the piping, thus securing the lug to the pipe. Surface examinations of the attachment welds at each attachment lug were performed during Refuel 10. The examinations revealed no recordable or reportable indications, thus demonstrating the structural integrity of the integrally welded attachments.

Based on the results of the examinations performed during Refuel 10, It was determined that failure to previously inspect the B-K-1 integrally welded attachments does not constitute an operability concern nor was the health and safety of the public at risk. As mentioned above, all the B-K-1 integrally welded attachments have now been inspected with no indications identified. Additionally, later editions of the ASME Code have significantly reduced the scope of ASME Section XI, B-K-1 weld examinations. The 1995 Addenda of ASME Section XI only requires approximately 10% of the welded attachments associated with component supports selected for examination during an interval be examined. This reduction in the required inspection scope from 100% to 10% indicates no significant Industry safety concerns exists relative to examinations of B-K-1 integrally welded attachments.

CAUSE

The cause of this event was personnel error, a lack of a questioning attitude and a general lack of ASME Section XI knowledge. Additionally, changes to the ISI program were performed without the use of adequate administrative controls.

IMMEDIATE CORRECTIVE ACTION

All Category B-K-1 inspections were identified and completed during Refuel 10. Ten surface examinations were identified, performed and documented as part of the Refuel 10 non-destructive examinations (NDE) scope.

ADDITIONAL CORRECTIVE ACTION

A review of the ISI Program will be completed by September 25, 1996 to provide additional assurance that all required examinations were included in the Second Interval 10-year ISI Plan.

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ACTIONS TO PREVENT RECURRENCE

1. Since the last 10-year update was performed, organizational responsibility for ISI was placed under Nuclear Engineering and Projects. Nuclear Engineering Procedure (NEP) 221, "Engineering Software and Technical Information Review", now governs the review and acceptance of vendor technical information and assures that such information receives appropriate FPC reviews. This will ensure future updates to ISI programs performed by vendors more clearly define Program Manager's responsibilities for technical acceptance of vendor deliverables. This action is complete.
2. A revision will be made to the ISI Program administrative controls to comply with the requirements of NEP-115, "Control of Nuclear Engineering Manuals". The revision to the administrative controls will also include guidance in accordance with Nuclear Operations Department (NOD) Manual Procedure 11, "Maintenance of the Current Licensing Basis", to ensure that required reviews are accomplished when the program is revised. This action will be completed by August 21, 1996.
3. A position specific training and qualification guide will be developed to ensure the individual responsible for the NDE part of the ISI Program has sufficient knowledge to adequately perform the required tasks. This action will be completed by September 2, 1996.
4. A new surveillance procedure implementing the NDE of welds within the ISI Program will be developed before the need for this procedure during Refuel 11. This action will be completed by December 5, 1997.

PREVIOUS SIMILAR EVENTS

There have been four previous reportable events involving administrative deficiencies relative to the ISI Program. These events were reported in LERs 87-018-01, 89-002-00, 90-013-00 and 94-005-00.

ATTACHMENTS

- Attachment 1 - List by Tag Number of Integrally Welded Attachments Subject to Examination.
- Attachment 2 - Figure IWB-2500-15, Integral Attachment (Typical Sketch)

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ATTACHMENT 1

List by Tag Number of Integrally Welded Piping Attachments Subject to Examination.

Decay Heat Hanger [BP,H]
Decay Heat Hanger [BP,H]
Core Flood Hanger [BP,H]
Core Flood Hanger [BP,H]
Core Flood Hanger [BP,H]
Reactor Coolant Hanger [AB,H]
Reactor Coolant Hanger [AB,H]
Reactor Coolant Hanger [AB,H]
Reactor Coolant Hanger [AB,H]
Reactor Coolant Hanger [AB,H]

DHH-11
DHH-7
CFH-5
CFH-7
CFH-11
RCH-46
RCH-49A
RCH-67
RCH-68
RCH-69

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ATTACHMENT 2

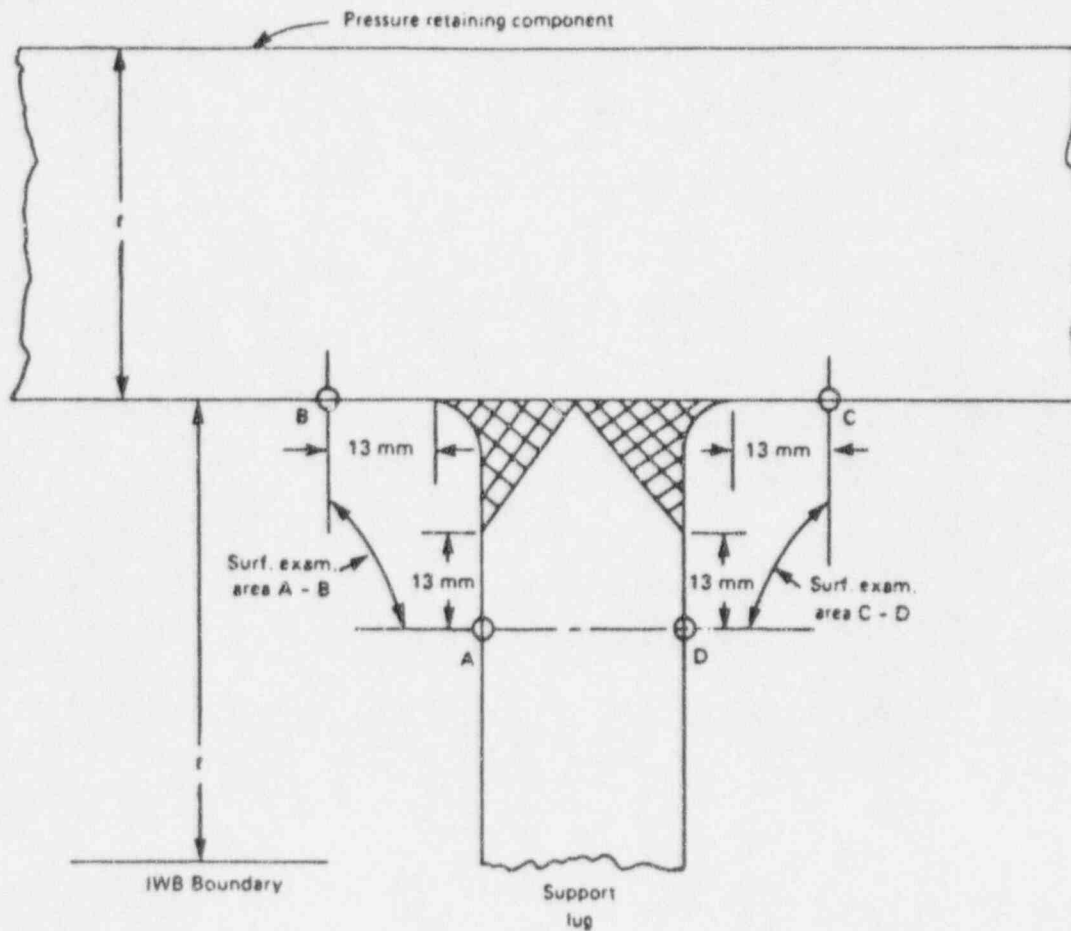


FIG. IWB-2500-15 INTEGRAL ATTACHMENT