



**Florida
Power**
CORPORATION

Crystal River Unit 3
Docket No. 50-302

January 4, 1993
3F0193-02

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

Subject: Licensee Event Report (LER) 92-025

Dear Sir:

Enclosed is Licensee Event Report (LER) 92-025 which is submitted in accordance with 10 CFR 50.73.

Sincerely,

G. L. Boldt
Vice President
Nuclear Production

EEF:mag

Enclosure

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

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EXPIRES 4/30/92

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 (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 (CR-3)										DOCKET NUMBER (2) 0 5 0 0 0 3 0 2				PAGE (3) 1 OF 0 4	
TITLE (4) Surveillance Scheduling Method Causes Failure To Complete Surveillance Procedure Within The Required Interval, Resulting In A Condition Prohibited By 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 N/A				DOCKET NUMBER(S) 0 5 0 0 0		
1	1	2	9	2	0 2 5	0	0	0	1	0	4	9	3	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)													
1		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)	
1 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)(vii)(A)					
		20.405(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(vii)(B)					
		20.405(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(i)					
LICENSEE CONTACT FOR THIS LER (12)															
NAME W. A. Stephenson, Nuclear Safety Supervisor										TELEPHONE NUMBER AREA CODE 9 0 4 7 9 5 - 6 4 8 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) (15)															

Crystal River Unit 3 was in MODE 1 at 100% power on November 23, 1992. On this date, plant personnel discovered that a surveillance procedure had not been performed within the required time period. This constituted a condition prohibited by Technical Specifications. The tests in question demonstrated OPERABILITY of the Toxic Gas Monitoring System.

This event was caused by the method in which quarterly and monthly surveillance requirements are scheduled.

The Master Surveillance Plan will be revised to schedule both the quarterly and monthly procedure due dates, rather than the current practice of scheduling only the quarterly procedure due date when its performance additionally satisfies the monthly requirements. Additionally, all other procedures with this potential problem will be identified and the Master Surveillance Plan revised accordingly.

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LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1) CRYSTAL RIVER UNIT 3 (CR-3)	DOCKET NUMBER (2) 0 5 0 0 0 3 0 2	LER NUMBER (6)			PAGE (3) 9 2 0 2 5 0 0 0 2 OF 0 4
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	

TEXT (If more space is required, Use additional NRC Form 306A's (17))

EVENT DESCRIPTION

Crystal River Unit 3 (CR-3) was in MODE 1 at 100% power on November 23, 1992. On this date, plant personnel discovered that a required surveillance procedure had not been performed within the time period allowed by Technical Specifications (TS). On November 24, 1992 plant personnel determined that this constituted a condition prohibited by TS.

The design of CR-3 includes a Toxic Gas Monitoring System [VI]. The system consists of two redundant trains of monitoring equipment. Each train monitors sulphur dioxide (SO₂) and Chlorine (Cl₂) levels in the outside makeup air stream to the Control Complex [NA]. The Control Complex contains the Control Room [NA], Cable Spreading Room [NA], and Remote Shutdown Panel [NA], as well as vital electrical equipment. Output signals from the Toxic Gas Monitoring System will cause various dampers in the Control Complex Ventilation System [VI] to change position and shut off outside makeup air if SO₂ or Cl₂ levels exceed predetermined limits.

Plant TS require that both Toxic Gas Monitoring trains be OPERABLE in all OPERATIONAL MODES. Associated surveillances require that CHANNEL FUNCTIONAL TESTS be performed once every 31 days and CHANNEL CALIBRATIONS be performed once every 18 months in order to demonstrate OPERABILITY of the monitors. TS allow an extension of these surveillance intervals, provided the extension does not exceed 25% of the specified interval. Therefore, surveillance tests required to be performed every 31 days may be performed up to 38 days apart.

The CHANNEL CALIBRATIONS are actually performed quarterly using plant procedures SP-372A and SP-372B. These procedures calibrate the "A" and "B" Toxic Gas Monitoring trains, respectively. CHANNEL FUNCTIONAL TESTS are performed monthly using procedure SP-377. During months in which both monthly and quarterly tests are due, performance of the quarterly CHANNEL CALIBRATION is used to satisfy the monthly CHANNEL FUNCTIONAL TEST requirements.

The surveillance schedule for CR-3 requires that the CHANNEL FUNCTIONAL TEST be performed on the third Friday of each month. The schedule also requires that the CHANNEL CALIBRATION be performed on the third Friday of the second month of each calendar quarter. Since both tests were to be performed during the month of November, performance of the CHANNEL CALIBRATION satisfied both surveillance requirements.

The third Friday of October fell on the sixteenth of the month. The third Friday of November fell on the twentieth of the month; thus, the scheduled interval between the October and November CHANNEL FUNCTIONAL TESTS was 35 days. This exceeded the 31 day surveillance interval, but was within the allowed 25% extension. Plant technicians completed the October CHANNEL FUNCTIONAL TEST one day

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TEXT (If more space is required, Use additional NRC Form 365A's (17)

early. This increased the scheduled November test interval to 36 days, and moved the end date of the 25% extension window to November 22, 1992.

Technicians began quarterly CHANNEL CALIBRATIONS on November 18, 1992. They tested the "A" train first. At this time, technicians were not aware that they were already performing the calibration during the 25% extension window. They did not realize that only two days remained in the maximum allowable surveillance window. Because the tests were scheduled for completion on November 22, 1992, technicians believed that the window ended sometime during the following week.

During the calibration, technicians discovered problems with the chlorine detector cell [VI,DDT]. The calibration was delayed while technicians replaced the cell. Also, the test gas initially used during the calibration did not produce a response from the monitors. Work was delayed while technicians obtained additional test gas. This delayed initiation of the "B" train calibration.

Technicians completed the "A" train CHANNEL CALIBRATION on Friday, November 20, 1992. Because technicians were unaware that the 25% extension window ended on Sunday, November 22, 1992, they did not proceed with the "B" train CHANNEL CALIBRATION through the weekend.

On Monday, November 23, 1992, plant personnel responsible for scheduling and tracking surveillance procedures contacted the technicians concerning the CHANNEL CALIBRATION. Upon learning that calibration was not completed, they then checked the surveillance procedure schedule and determined that the maximum allowable surveillance window had been exceeded.

CAUSE

This event was caused by the method in which surveillances using a plurality of procedures are scheduled.

The Master Surveillance Plan schedules surveillances to be performed on specific days of the week during specific months (i.e., third Friday of the third month of each quarter, first Tuesday of each month, etc.). This sometimes results in scheduled surveillance intervals which exceed the interval specified in TS but do not exceed the allowed 25% window. This in itself is not a problem as long as personnel responsible for performing surveillances are aware of the applicable schedule requirements.

In this isolated event, the quarterly surveillance also satisfies the monthly surveillance requirements; and the daily schedule given to the technicians did not indicate that the 25% window for the monthly surveillance (CHANNEL FUNCTIONAL TESTS) ended on November 22, 1992. Since the 25% window for the quarterly surveillance ended December 12, 1992, the technicians did not pursue completion of the quarterly surveillance (CHANNEL CALIBRATION) over the weekend.

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PAGE (3)

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TEXT (If more space is required, Use additional NRC Form 365A's (17))

CORRECTIVE ACTION

The Master Surveillance Plan will be revised to modify the scheduling method used when one procedure (e.g., quarterly surveillance) is used to satisfy the requirements of a second procedure (e.g., monthly surveillance). The new scheduling practice will be to show the due dates for both procedures, thereby assuring the most conservative completion windows are defined for field work. Additionally, all other procedures with this potential problem will be identified and the Master Surveillance Plan revised to independently schedule the applicable procedures.

EVENT ANALYSIS

This event posed no threat to the safety of the plant or the general public. At least one OPERABLE Toxic Gas Monitoring train was available at all times.

PREVIOUS SIMILAR EVENTS

This is the first event in which Toxic Gas Monitoring System Surveillance was not completed within the time frame allowed by TS.