

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) CRYSTAL RIVER UNIT 3										DOCKET NUMBER (2) 0 5 0 0 0 3 0 2				PAGE (3) 1 OF 03										
TITLE (4) Deviation From Administrative Controls For Low Temperature Overpressurization Protection																								
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	2	1	1	8	4	8	4	0	2	3	0	0	0	5	3	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)																					
POWER LEVEL (10)			20.402(b)				20.406(c)				50.73(a)(2)(iv)				73.71(b)									
0			20.406(a)(1)(i)				50.38(a)(1)				50.73(a)(2)(v)				73.71(a)									
9			20.406(a)(1)(ii)				50.38(a)(2)				50.73(a)(2)(vi)				<input checked="" type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 366A)									
3			20.406(a)(1)(iii)				50.73(a)(2)(i)				50.73(a)(2)(viii)(A)				Voluntary									
			20.406(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)													
			20.406(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(ix)													
LICENSEE CONTACT FOR THIS LER (12)																								
NAME										TELEPHONE NUMBER														
W. K. Bandhauer, Nuclear Safety Supervisor										9 0 4 7 9 5 - 6 4 8 6														
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																								
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPD		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPD														
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR								
<input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)												NO		1	1	1	5	8	5					

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

The Safety Evaluation Report prepared by the NRC in support of License Amendment 21 describes several administrative controls to prevent low temperature overpressurization events at Crystal River Unit 3. Subsequent to committing to those controls, Florida Power Corporation identified on December 11, 1984 that they are in conflict with some existing plant practices. It should be noted that other administrative controls are in place that have successfully prevented low temperature overpressurization events.

Corrective actions include submission of a request for change to applicable Technical Specifications. A supplement to this LER describing other areas of conflict will be submitted.

LER 84-023 is submitted voluntarily for information.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/85

FACILITY NAME (1) CRYSTAL RIVER UNIT 3	DOCKET NUMBER (2) 0 5 0 0 0 3 0 2 8 4	LER NUMBER (5)			PAGE (3) OF 0 3		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		— 0	2 3	— 0 0			

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

EVENT DESCRIPTION

On several occasions during the operation of the plant, the High Pressure Injection (BQ) pumps and discharge valves have been tested in Modes 4 or 5, thus deviating from several letters of commitment and the Safety Evaluation Report on Amendment 21 to Technical Specifications. This was identified in a Quality Programs Audit on December 11, 1984. Those deviations were discovered by a routine internal audit and were previously reported in LER 83-50 dated December 22, 1983 as a failure to perform surveillance testing prior to mode ascension.

By letters dated December 2, 1976, February 17, 1977, and January 5, 1978, Florida Power Corporation committed to several administrative controls to help provide Reactor Coolant System overpressurization protection. These administrative controls are cited in the NRC's Safety Evaluation Report for License Amendment 21. The particular controls at issue here are summarized below:

1. High Pressure Injection (HPI) discharge valves (MUV-23, MUV-24, MUV-25, MUV-26) may be closed and "racked out" when below 280 degrees Fahrenheit (Modes 4, 5, and 6).
2. During shutdown, the HPI pumps (MUP-1A, MUP-1B, MUP-1C) will be tested only when the reactor vessel head is removed.

The above commitments are in conflict with the following Technical Specifications:

1. Specification 4.5.2.g requires (following a system modification) an HPI flow balance test during shutdown at a system pressure of 600 psig. This test cannot be performed with the HPI discharge valves closed and breakers "racked out," nor can the required system pressure be attained with the reactor vessel head removed.
2. Specification 4.5.2.f requires HPI valves to be tested during shutdown by injection of a test signal. Again, "racked out" breakers preclude the performance of this test.
3. Specification 4.8.1.1.2.c.3 requires that Engineered Safeguards equipment (including HPI pumps) be actuated and loaded onto a running Emergency Diesel Generator. It is not desirable to perform this test in Mode 6 due to the potential for overfilling the fuel transfer canal and the resultant increase in Reactor Building airborne activity. Furthermore, the test would be difficult to control with the HPI valve breakers "racked out."

In deviation from the administrative controls discussed above, Crystal River Unit 3 has performed HPI valve and pump testing in Modes 4 or 5. Careful review reveals that such testing is permitted under the applicable Technical Specifications. Additional deviations will be discussed in a supplement to this LER.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/85

FACILITY NAME CRYSTAL RIVER UNIT 3	DOCKET NUMBER (2) 0 5 0 0 0 3 0 2	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 4	— 0 2 3	— 0 0	0 3	OF	0 3

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

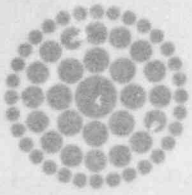
SAFETY CONSIDERATIONS

The Safety Evaluation Report for Amendment 21 granted credit for certain administrative controls as a supplement to the Overpressure Mitigating System. During the performance of surveillance procedures pertaining to ECCS components, the probability of an overpressurization occurrence may have increased beyond that considered in the evaluation report. At no time, however, were the pressure/temperature limits of Specification 3.4.9.1 exceeded. Furthermore, the deviations cited resulted in no violations of Technical Specifications since all applicable surveillance requirements were satisfied. Other administrative controls apart from those discussed above have successfully prevented any low temperature overpressurization events.

CORRECTIVE ACTION

Other areas of conflict have been identified for resolution and will be described in a supplement to this LER. A request will be submitted for changes to the applicable Technical Specifications such that they will conform to previous commitments made to the NRC.

This LER is submitted for information. This is the first time that deviations from administrative controls for low temperature overpressurization protection have been identified.



**Florida
Power**
CORPORATION

May 31, 1985
3F0585-29

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

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Licensee Event Report No. 84-023

Dear Sir:

Enclosed is Licensee Event Report (LER) No. 84-023 which is submitted voluntarily by Florida Power Corporation.

Should there be any questions, please contact this office.

Sincerely,

G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

AEF/feb

Enclosure

cc: Dr. J. Nelson Grace
Regional Administrator, Region II
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30323

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