



**Florida
Power**

CORPORATION
Crystal River Unit 3
Docket No. 50-302

November 8, 1996
3F1196-09

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

Subject: Licensee Event Report (LER) 96-023-00

Dear Sir:

Please find the enclosed Licensee Event Report (LER) 96-023-00 concerning a missed technical specification surveillance requirement involving an emergency feedwater pump discharge pressure instrument. This report is submitted in accordance with 10 CFR 50.73.

Sincerely,

P.M. Beard, Jr.

P.M. Beard, Jr.,
Senior vice President
Nuclear Operations

PMB/TWC
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 (NMNB 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.

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| FACILITY NAME (1) | | | | | | | | | | DOCKET NUMBER (2) | | | | | | | | | | PAGE (3) | | | | | | | | | |
| CRYSTAL RIVER UNIT 3 (CR-3) | | | | | | | | | | 0 5 0 0 0 3 0 2 | | | | | | | | | | 1 OF 0 5 | | | | | | | | | |
| TITLE (4) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Personnel Error Leads to Missed 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 | 0 | 9 | 9 | 6 | 9 | 6 | --- | 0 | 2 | 3 | --- | 0 | 0 | 1 | 1 | 0 | 8 | 9 | 6 | N/A | | | | 0 5 0 0 0 | | | | |
| OPERATING MODE (9) | | | 5 | | | 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)(x) | | | | | | | | | | | | | | | | | | | | | | | |
| LICENSEE CONTACT FOR THIS LER (12) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| NAME | | | | | | | | | | TELEPHONE NUMBER | | | | | | | | | | | | | | | | | | | |
| Wm J. Leonard, Licensing Engineer | | | | | | | | | | AREA CODE | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | 3 5 2 5 6 3 - 4 0 2 1 | | | | | | | | | | | | | | | | | | | |
| COMPLETE ONE LINE FOR EACH COMPONENT FAILURE IN THIS REPORT (13) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NPRDS | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NPRDS | | | | | | | | | | | | | | | | | | | | |
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| SUPPLEMENTAL REPORT EXPECTED (14) | | | | | | | | | | EXPECTED SUBMISSION DATE (15) | | | | | | | | | | | | | | | | | | | |
| YES (If yes, complete EXPECTED SUBMISSION DATE) | | | | | | | | | | MONTH DAY YEAR | | | | | | | | | | | | | | | | | | | |
| X NO | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

On October 9, 1996, Florida Power Corporation's Crystal River Unit 3 (CR-3) was in MODE 5 (COLD SHUTDOWN). Technical Specification Surveillance Requirement 3.3.18.1 requires that a CHANNEL CHECK be performed on Remote Shutdown instruments listed in Table 3.3.18-1 every 31 days with the unit in Modes 1, 2, or 3. It was determined that Table 3.3.18-1 Function/Instrument 3.e, "Motor Driven EFW Pump Discharge Pressure Instrument (EF-2-PI)" was not included in surveillance procedure SP-338, "Remote Shutdown and Post Accident Monitoring Channel Check."

Subsequent investigation determined that the CHANNEL CHECK for EF-2-PI had been removed from SP-338 on October, 31, 1995 after being placed in procedure SP-349A, "EFP-1 and Valve Surveillance." SP-349A specified a frequency of "Q," once per 92 days, for the channel check. Thus from October, 31, 1995, until October 9, 1996, Technical Specifications were not met due to failure to perform the CHANNEL CHECK for EF-2-PI at the required frequency. The primary cause of this event was personnel error. Corrective actions include revising applicable procedures and databases, and reviewing the event with individuals involved.

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LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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 (MNBB 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.

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| FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) | | | PAGE (3) |
| CRYSTAL RIVER UNIT 3 (CR-3) | 0 5 0 0 0 3 0 2 9 6 | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | 0 2 OF 0 5 |
| | | --- | 0 2 3 | 0 0 | |
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TEXT (If more space is required, Use additional NRC Form 366A's (17))

EVENT DESCRIPTION

On October 9, 1996, Florida Power Corporation's Crystal River Unit 3 (CR-3) was in MODE 5 (COLD SHUTDOWN). Improved Technical Specification (ITS) Surveillance Requirement 3.3.18.1 requires that a CHANNEL CHECK be performed on Remote Shutdown [JL] instruments listed in Table 3.3.18-1 every 31 days with the unit in Modes 1, 2, or 3. Operations personnel determined that Table 3.3.18-1 Function/Instrument 3.e, "Motor Driven EFW Pump Discharge Pressure Instrument (EF-2-PI)" was not included in Surveillance Procedure SP-338, "Remote Shutdown and Post Accident Monitoring Channel Check."

Prior to the implementation of Improved Technical Specifications (ITS), the monthly CHANNEL CHECK for EF-2-PI [BA,PI], a local indicating Bourdon type gage, was performed monthly in surveillance procedure SP-349A, "EFP-1 and Valve Surveillance." EFP-1 is the motor-driven Emergency Feedwater Pump [BA,P]. The CHANNEL CHECK involved observing the gage response during the pump test. With the implementation of ITS in January, 1994, the frequency of the SP-349A EFP-1 pump run was changed to once per 45 days on a STAGGERED TEST BASIS. The monthly CHANNEL CHECK for EF-2-PI was therefore removed from SP-349A and added to SP-338, "Remote Shutdown and Post Accident Monitoring Channel Check." At this time the CHANNEL CHECK became a simple check that the single instrument was reading idle pump discharge pressure.

In June, 1995, a procedure enhancement request was made to return the EF-2-PI CHANNEL CHECK to SP-349A to obtain a better check of the instrument function. This change was made on June 22, 1995. SP-349A was erroneously changed to indicate a frequency for performance of the EF-2-PI CHANNEL CHECK of once per 92 days. The error was not identified in the review and approval cycle. Information was then added to Nuclear Operations Commitment System (NOCS) commitment (#060315) erroneously stating that the "once per 31 day" SR 3.3.18.1 CHANNEL CHECK requirement for EF-2-PI was satisfied by performance of SP-349A.

On October 31, 1995, SP-338 was revised to remove the requirement to perform a CHANNEL CHECK of EF-2-PI. The reason for the removal was that the requirement was satisfied by SP-349A as documented by information in NOCS Commitment 060315. Again, the error was not identified in the procedure revision review and approval process.

Between October 31, 1995 and September 2, 1996, while CR-3 was operating in Modes 1, 2, or 3, the required CHANNEL CHECK for EF-2-PI was performed once per 90 days rather than its required once per 31 day frequency. Thus, the Improved Technical Specifications surveillance requirement was not met.

Subsequent investigation revealed that the instruments currently used to monitor Emergency Feedwater (EFW) operation are not specified in Improved Technical Specification Table 3.3.18-1 Function/Instrument 3.e. The purpose of Improved

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

Technical Specification 3.3.18, Remote Shutdown System, is to ensure that "there is sufficient information available on selected unit parameters to maintain the unit in MODE 3 should the Control Room become inaccessible." Prior to the installation of the Remote Shutdown Panel [JL], EF-2-PI was the only instrument available to monitor the EFW system. However, EFW flow indicators [BA,FI] EF-23-FI2, EF-24-FI2, EF-25-FI2, & EF-26-FI2 were installed on the Remote Shutdown Panel. These indicators, rather than EF-2-PI, would be used to monitor the operation of the EFW system should the control room become inaccessible. While the Remote Shutdown Panel EFW flow indicators are not included in the Improved Technical Specifications, their operability is assured by performance of surveillance procedures SP-193B, "EFW Flow Transmitter Channel Calibration," (2-year frequency) and SP-146C, "EFIC Flow Control Verification" (quarterly frequency).

This event is reported in accordance with 10CFR50.73(a)(2)(i)(B) as a condition prohibited by technical specifications.

EVENT EVALUATION

The purpose of Surveillance Requirement 3.3.18.1 for Function/Instrument 3.e is to ensure that there is sufficient information available on Emergency feedwater system parameters to confirm its ability to maintain the unit in safe shutdown should the Control Room become inaccessible.

The operability of EF-2-PI is assured during the testing of EFP-1 when verifying pump discharge pressure in accordance with SP-349A which is performed on a 45 day staggered frequency (every 90 days). In addition, the Remote Shutdown System EFW Flow indicators (although not controlled by a Technical Specification) provide acceptable means of determining EFW system performance while the Control Room is inaccessible. Further, the Remote Shutdown System Steam Generator Level indicators [JL,LI], controlled by Technical Specification Table 3.3.18-1, Function/Instrument 3.d provide the operator adequate information to determine if the EFW system is performing its function.

Therefore, there was always the capability to monitor the EFW system to confirm its ability to maintain the unit in safe shutdown with the Control Room inaccessible. This event did not compromise the health and safety of the general public.

CAUSE

The primary cause of the event was personnel error in the procedure preparation and review process. In June, 1995, personnel errors were also made in the preparation and review of changes to SP-349A and in the updating of implementing information in NOCS commitment 060315. In October, 1995, changes were made to SP-338 which erroneously removed the requirement to perform a monthly CHANNEL CHECK of EF-2-PI.

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FACILITY NAME (1)

CRYSTAL RIVER UNIT 3 (CR-3)

DOCKET NUMBER (2)

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

A contributing factor to the event was confusion over the intent of the Technical Specification and methods of implementing a CHANNEL CHECK for a single, downscale instrument.

IMMEDIATE CORRECTIVE ACTION

None Required. CR-3 was in MODE 5 at the time of discovery. The Remote Shutdown System was not required to be operable.

ADDITIONAL CORRECTIVE ACTION

1. Prior to startup from the current outage, pending satisfactory completion of Action 3, below, appropriate procedure changes will be made to ensure strict compliance with Improved Technical Specification Surveillance Requirement 3.3.18.1 for Function/Instrument 3.e. These changes will be accurately identified in the NOCS commitment.
2. Prior to startup from the current outage, appropriate calibration and CHANNEL CHECK procedures will be confirmed in-place for instruments currently used in the Remote Shutdown System to maintain the Unit in safe shutdown when the Control Room is inaccessible.
3. Prior to startup from the current outage, appropriate Improved Technical Specification changes will be initiated to ensure that the Functions/Instruments specified in Table 3.3.18-1 are those currently used in the Remote Shutdown System to maintain the Unit in safe shutdown when the Control Room is inaccessible.

ACTION TO PREVENT RECURRENCE

1. The event will be reviewed with personnel responsible for preparation and review of the June, 1995 revision to SP-349A and the October, 1995 revision to SP-338.
2. Procedure AI-400C, "New Procedures and Procedure Change Process," will be revised to include a more focused technical review. This should enhance the results of procedure reviews.

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

PREVIOUS SIMILAR EVENTS

Since 1990, there have been six (6) LERs for missed Technical Specification Surveillances caused by personnel error:

LER 90-011, Modification Review Oversight Results in Technical Specification Violation

LER 92-014, Technical Specification Surveillance Due to Failure to Recognize Inoperable Rod Index Computer Alarms

LER 94-011, Personnel Error Leads to Missed Surveillance Resulting in a Violation of Technical Specifications

LER 94-012, Personnel Error Leads to Missed Surveillance Resulting in a Violation of Technical Specifications

LER 95-007, Inattention to Detail Caused Delay in performance of Surveillance Resulting in Violation of Technical Specifications

LER 96-018, Missed Surveillance Caused by Personnel Error which led to Inadequate Surveillance Procedure

ATTACHMENT

None