

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Turkey Point Unit 3										DOCKET NUMBER (2) 0 5 0 0 0 2 5 0										PAGE (3) 1 OF 0 2																					
TITLE (4) Technical Specification - Containment Sump Level Indication																																									
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)								
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1 0			2 4			8 5			8 5			0 3			5 0			0 0			1 1			2 5			8 5			N/A						0 5 0 0 0					
OPERATING MODE (9) 5						THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 8: (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)						50.38(e)(1)						50.73(a)(2)(v)						73.71(c)																	
						20.405(a)(1)(ii)						50.38(e)(2)						50.73(a)(2)(vi)						OTHER (Specify in Abstract below and in Text, NRC Form 365A)																	
						20.405(a)(1)(iii)						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 R. L. Teuteberg, Regulation and Compliance Engineer														TELEPHONE NUMBER 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 NPD				CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NPD																					
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SUPPLEMENTAL REPORT EXPECTED (14)																																									
YES (If yes, complete EXPECTED SUBMISSION DATE)														X NO		EXPECTED SUBMISSION DATE (15)				MONTH		DAY		YEAR																	

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

Event:

On October 24, 1985, while Unit 3 was in a cold shutdown condition for scheduled maintenance activities, Turkey Point Plant personnel discovered that the accident monitoring instrumentation operability requirements of Technical Specification 3.5, Table 3.5-5 had been exceeded. Technical Specification Table 3.5-5 requires that both channels of the narrow range sump level indication shall not be out of service simultaneously for more than 30 days. On July 31, 1985, the narrow range containment sump level instrumentation LT-6308A was taken out of service due to a failed level switch in one of five cascading level transmitters. PC/M 85-109 was also generated in July 1985, and required the relocation of a receiver for the redundant narrow range sump level instrumentation LT-6308B. This receiver had been located in the post LOCA radiation shine of a containment penetration, which could have made this sump level instrumentation channel unable to correctly register sump levels during the post LOCA period. Since both sump level indication channels were not capable of performing their intended functions from July 31, 1985 to October 31, 1985, this coincidence violated Technical Specification 3.5.

Cause of Event:

This situation was the result of the failure of personnel to recognize that the post LOCA integrated radiation dose of the receiver for the containment sump level indicator LT-6308B could have made this channel inoperable as indicated in PC/M 85-109.

Corrective Actions:

The following corrective actions were taken or are planned:

- 1) The receiver in the containment sump level indicator channel LT-6308B was relocated out of the radiation shine, was recalibrated, and placed back into service on October 31, 1985.
- 2) The redundant containment sump level channel LT-6308A will be repaired and placed back into service during a future plant shutdown of sufficient duration.

The health and Safety of the public were not affected. Similar occurrences: None

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/85

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

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

Event:

On October 24, 1985, while Unit 3 was in a cold shutdown condition for scheduled maintenance activities, Turkey Point Plant personnel discovered that the accident monitoring instrumentation operability requirements of Technical Specification 3.5, Table 3.5-5 had been exceeded. Technical Specification Table 3.5-5 specifies the minimum operability requirements for the narrow range containment sump level indication. This table requires that both channels of the narrow range sump level indication shall not be out of service simultaneously for more than 30 days.

On July 31, 1985, the narrow range containment sump level instrumentation LT-6308A was taken out of service. The control room recorder was exhibiting erratic behavior and would not follow all level changes in the sump. A maintenance investigation identified a failed level switch in one of the five cascading level transmitters that indicate water level within the sump. Spare parts were ordered, but replacement could not be completed until the next shutdown of sufficient duration. On July 15, 1985, a plant change/modification (PC/M 85-109) was issued for review and comments which required the relocation of a receiver module for the redundant narrow range sump level instrumentation LT-6308B. This receiver had been located in the electrical penetration area within the post LOCA radiation shine of a containment penetration. The radiation shine following a LOCA event could have damaged solid state devices within the receiver for LT-6308B to an extent which may have rendered this level channel unable to correctly indicate sump levels. Because both channels of containment sump level indication were not capable of performing their intended functions from July 31, 1985 to October 31, 1985, i.e., longer than 30 days, this coincidence exceeded the requirements of Table 3.5-5 of Technical Specification 3.5.

Cause of Event:

Exceeding the requirements of Technical Specification 3.5 was the result of the failure of personnel to recognize that the post LOCA integrated radiation dose of the receiver for the containment sump level indicator LT-6308B could have made this channel inoperable as indicated in PC/M 85-109.

Analysis of Event:

The narrow range containment sump level indication channels together with two wide range containment water level channels provide containment sump and containment water level indication, alarm, and strip recorder functions to the control room after a LOCA or actuation of containment sprays. The containment sump level indication is used by operators as one means to determine leakage rates for small break LOCAs and establish the severity of the LOCA. Because the containment sump level indication is not the only indication that operators can rely on for information on a small break LOCA, the information provided by the containment sump level can be duplicated by other systems or methods not affected by the failures identified above. In addition, the two wide range containment water level indication channels were operational during this event. Therefore, the health and safety of the public were not affected during this incident.

Corrective Actions:

The following corrective actions were taken or are planned.

- 1) The receiver in the electrical penetration room for the containment sump level indicator channel LT-6308B was relocated out of the path of potential radiation shine.
- 2) The LT-6308B channel was recalibrated after relocation of the receiver and the channel was placed back into service on October 31, 1985. This removed the containment sump level indication system from the Technical Specification action statement.
- 3) The redundant containment sump level channel LT-6308A will be repaired and placed back into service during a future plant shutdown of sufficient duration.

Additional Information:

The receiver in channel LT-6308B which was relocated is a Transamerica Delaval Model RE-36562, part number 61125. The level transmitter in channel LT-6308A with a failed switch is a Model XM-54853 manufactured by Transamerica Delaval. Similar occurrences: None.



NOV 25 1985

L-85-445

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

Gentlemen:

Re: Reportable Event 85-35
Turkey Point Unit 3
Date of Event: October 25, 1985
Technical Specification - Containment Sump Level Indication

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 cursive script, appearing to read "J. W. Williams, Jr.", is written over a horizontal line.

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

JWW/PLP: mls

Attachment

cc: Dr. J. Nelson Grace
Region II, USNRC
Harold F. Reis, Esquire
PNS-LI-85-471/2

Handwritten initials "LE22" are written above a vertical line that ends in a small hook.