



**Florida
Power**

CORPORATION
Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72

February 9, 2000
3F0200-07

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

Subject: Licensee Event Report (LER) 50-302/00-001-00

Dear Sir:

Please find attached Licensee Event Report (LER) 50-302/00-001-00. This LER discusses a Surveillance Requirement that was not performed within the required time frame of Improved Technical Specifications. This report is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B).

If you have any questions concerning this submittal, please contact Mr. Sid Powell, Manager, Nuclear Licensing, at (352) 563-4883.

Sincerely,

D. L. Roderick
Director
Nuclear Engineering and Projects

DLR/rlm

Attachment

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

IE22

LICENSEE EVENT REPORT (LER)

Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), 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. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

FACILITY NAME (1)

CRYSTAL RIVER UNIT 3

DOCKET NUMBER (2)

05000302

PAGE (3)

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TITLE (4)

Surveillance Requirement Was Not Performed Within The Required Time Frame Of Improved 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 NAME	DOCKET NUMBER
01	12	00	00	-- 001 --	00	02	09	00	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		99.9	20.2201(b)		20.2203(a)(2)(v)		X		50.73(a)(2)(i)	50.73(a)(2)(viii)
			20.2203(a)(1)		20.2203(a)(3)(i)				50.73(a)(2)(ii)	50.73(a)(2)(x)
			20.2203(a)(2)(i)		20.2203(a)(3)(ii)				50.73(a)(2)(iii)	73.71
			20.2203(a)(2)(ii)		20.2203(a)(4)				50.73(a)(2)(iv)	OTHER
			20.2203(a)(2)(iii)		50.36(c)(1)				50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)		50.36(c)(2)				50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

Robert L. McLaughlin, Sr. Regulatory Specialist

TELEPHONE NUMBER (Include Area Code)

(352) 795-6486

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

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 15 single-spaced typewritten lines) (16)

On January 12, 2000, Florida Power Corporation's (FPC) Crystal River Unit 3 (CR-3) was in MODE 1 (POWER OPERATION) at 99.9 percent RATED THERMAL POWER. FPC personnel discovered that a Surveillance Requirement (SR) was not performed within the required time frame of Improved Technical Specifications (ITS). ITS 3.6.3, "Containment Isolation Valves (CIVs)," provides the Conditions and Required Actions necessary to maintain the CIVs OPERABLE. ITS SR 3.6.3.3 requires verification every 31 days that each containment isolation manual valve and blind flange located outside containment is closed. Makeup and Purification Valve MUV-520 became a CIV as a result of a plant modification installed during Refuel 11 but was not added to the CIV surveillance procedure until January 11, 2000. The cause was a weakness in the technical review process. MUV-520 was verified to be in the correct position. There was no decrease in protection of the health and safety of the public.

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

DESCRIPTION

On January 12, 2000, Florida Power Corporation's (FPC) Crystal River Unit 3 (CR-3) was in MODE 1 (POWER OPERATION) at 99.9 percent RATED THERMAL POWER. FPC personnel discovered that a Surveillance Requirement (SR) was not performed within the required time frame of Improved Technical Specifications (ITS). ITS 3.6.3, "Containment Isolation Valves (CIVs)[BD, ISV]," provides the Conditions and Required Actions necessary to maintain the CIVs OPERABLE. ITS SR 3.6.3.3 requires verification that each containment isolation manual valve and blind flange located outside containment required to be closed during accident conditions is closed. This Surveillance Requirement is satisfied by a system walkdown on a 31 day frequency. Surveillance Procedure SP-341, "Monthly Containment Isolation Valve Operability Check," is used to perform this Surveillance Requirement.

On January 11, 2000, FPC revised SP-341, adding a requirement to verify that Makeup and Purification System vent and drain valve MUV-520 [CB, VTV] was closed and capped. When a question arose as to how the SR had been met prior to this revision, a determination was made on January 12, 2000, that MUV-520 had not been previously surveilled. An investigation revealed that MUV-520 became a CIV as a result of a plant modification installed during the Refuel 11 outage, which ended in November, 1999. MUV-520 should have been surveilled by December 9, 1999, but was not surveilled until January 11, 2000. The failure to perform the Surveillance Requirement is a condition prohibited by ITS and is reportable pursuant to 10CFR50.73(a)(2)(i)(B).

EVALUATION

The containment consists of the concrete reactor building (RB)[NH], its steel liner, and the penetrations through this structure. The structure is designed to contain water and steam, as well as radioactive material that may be released from the reactor core following a Design Basis Accident (DBA). The DBAs that result in a challenge to containment from high pressures and temperatures are a loss of coolant accident (LOCA), a steam line break, and a rod ejection accident (REA). A release of significant fission product radioactivity within containment can occur from a LOCA or REA. In the safety analyses of DBAs involving release of fission product radioactivity, it is assumed that the containment is OPERABLE so that the release to the environment is controlled by the rate of containment leakage.

The containment isolation valve safety function is to control containment leakage during a DBA. As part of the containment boundary, containment isolation valve OPERABILITY supports leak tightness of the containment. The normally closed isolation valves are considered OPERABLE when manual valves are closed, check

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valves have flow through the valve secured, blind flanges are in place, and closed systems are intact. The OPERABILITY requirements for containment isolation valves provide assurance that the containment leakage rate assumed in the safety analyses will not be exceeded.

SR 3.6.3.3 requires verification that each containment isolation manual valve and blind flange located outside containment, and required to be closed during accident conditions, is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside the containment boundary is within design limits. It involves verification, through a system walkdown, that those valves outside containment and capable of being mispositioned are in the correct position. A 31 day frequency for performing the Surveillance Requirement is specified in ITS.

MUV-520 is a small (3/4 inch) manual valve with a threaded cap. Although the Surveillance Requirement for MUV-520 was not performed during the period December 9, 1999, to January 11, 2000, it was found in the correct position when verified (closed and capped). The threaded cap and a second normally closed 3/4 inch manual valve in that line further reduces the potential for containment leakage if the valve had been mispositioned. Therefore, FPC concludes this condition did not represent a reduction in the public health and safety. Also, the identified condition does not represent a Safety System Functional Failure.

CAUSE

The primary cause of the problem was a weakness in the technical review process. The impact of the modification on SP-341 was also not appropriately implemented by FPC personnel during the technical review.

IMMEDIATE CORRECTIVE ACTIONS

MUV-520 was verified to be in the correct position with the threaded cap installed. An extent of condition review was conducted on the plant modification installed during Refuel 11 involving containment penetrations to determine if other problems occurred. No other deficiencies were noted.

ACTIONS TO PREVENT RECURRENCE

This modification was designed under Nuclear Engineering Procedure NEP-210, "Modification Approval Records." NEP-210 was replaced in March, 1999 by NEP-210A, "Enhanced Modification Approval Records," which strengthens this process by

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identifying and appropriately assigning technical reviewers. Lessons learned from this event will be communicated to engineering and operations personnel to improve the awareness of the requirements.

PREVIOUS SIMILAR EVENTS

LER 99-006-00 Procedure Revision Causes Improved Technical Specification Surveillance Requirements To Be Implemented Improperly

LER 98-013-00 Procedural Inadequacy Caused By Personnel Error Results In Missed Surveillance Requirements

LER 96-018-01 Inadequate Containment Penetration Surveillance Procedures Result In Technical Specification Violation.

ATTACHMENTS

Attachment 1 - Abbreviations, Definitions, and Acronyms
Attachment 2 - List of Commitments

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)**ATTACHMENT 1****ABBREVIATIONS, DEFINITIONS, AND ACRONYMS**

10CFR	Title 10 of the Code of Federal Regulations
CIV	Containment Isolation Valve
CR-3	Crystal River Unit 3
DBA	Design Basis Accident
FPC	Florida Power Corporation
ITS	Improved Technical Specifications
LER	Licensee Event Report
LOCA	Loss of Coolant Accident
MUV	Makeup and Purification Valve
NOS	Nuclear Operations Support
NUPOST	Nuclear Operations Procedure Observations and Suggestions Tracking
SP	Surveillance Procedure
RB	Reactor Building
REA	Rod Ejection Accident
SR	Surveillance Requirement

Note: Improved Technical Specifications terms appear in capitalization in the text of the LER. EIS Codes appear in square brackets. Defined terms / acronyms / abbreviations appear in parentheses when first used.

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ATTACHMENT 2

List of Commitments

RESPONSE SECTION	COMMITMENT	DUE DATE
	No regulatory commitments are made in this submittal.	