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 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 90-015-00: on 900806, diesel fuel oil analysis TS
 surveillance verification time requirement exceeded.

W/9 ltr.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

Docket No. 50-397

September 10, 1990

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

Subject: NUCLEAR PLANT NO. 2
LICENSEE EVENT REPORT NO. 90-015

Dear Sir:

Transmitted herewith is Licensee Event Report No. 90-015 for the WNP-2 Plant. This report is submitted in response to the report requirements of 10CFR50.73 and discusses the items of reportability, corrective action taken, and action taken to preclude recurrence.

Very truly yours,



J. W. Baker (M/D 927M)
WNP-2 Plant Manager

JWB:lr

Enclosure:
Licensee Event Report No. 90-015

cc: Mr. John B. Martin, NRC - Region V
Mr. C. J. Bosted, NRC Site (M/D 901A)
INPO Records Center - Atlanta, GA
Ms. Dottie Sherman, ANI
Mr. D. L. Williams, BPA (M/D 399)

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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. 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) Washington Nuclear Plant - Unit 2										DOCKET NUMBER (2) 0 5 0 0 0 3 9 7 1				PAGE (3) 1 OF 0 5		
TITLE (4) Diesel Fuel Oil Analysis Technical Specification Surveillance Verification Time Requirement Exceeded Due to Inadequate Procedure and Personnel Error																
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)			
0 8	0 6	9 0	9 0	0 1 5	0 0	0 9	1 0	9 0					0 5 0 0 0			
OPERATING MODE (9) 1			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)													
POWER LEVEL (10) 0 5 8			20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)	
			20.405(a)(1)(i)				50.38(c)(1)				50.73(a)(2)(v)				73.71(c)	
			20.405(a)(1)(ii)				50.38(c)(2)				50.73(a)(2)(vii)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)	
			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)(ix)					
LICENSEE CONTACT FOR THIS LER (12)																
NAME W. S. Davison, Compliance Engineer										TELEPHONE NUMBER AREA CODE 5 0 9 6 1 2 7 1 - 1 2 5 0 1 1						
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13) X 2 7 2 6																
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs						
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) (16)

On August 9, 1990, it was discovered that a violation of WNP-2 Technical Specifications had occurred when the monthly diesel generator fuel oil particulate contamination analysis for Diesel Fuel Oil Tank 1B had not been verified within the required seven day time frame. The analysis results which were within Technical Specification requirements were received at 1250 hours on August 9, 1990, ten days after the sample was taken. The root causes of this event were evaluated as being: Work practices less than adequate - Manual tracking systems used by the plant chemistry group and material requirements group failed to identify the surveillance prior to exceeding the seven day time frame, therefore a personnel error went undetected until it was too late; Procedures less than adequate - Three separate procedures had to be used to complete the fuel oil sampling and analysis, none of them was adequate to ensure that the seven day time requirement was met. A single key step in one of the procedures contained two separate actions. One of the procedures was recently deviated, the deviation omitted a key step which required meeting the seven day time restriction. Corrective actions consist of: Canceling

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TEXT CONTINUATION

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

the temporary procedure for fuel oil tank sampling; Replacing a dual purpose sampling procedure for fuel oil with two individual procedures; Improving the quality of the fuel oil sampling procedures by simplifying and strengthening accountability; Elimination of an extraneous organization from the sample testing process; Modifying the purchase order for the offsite fuel oil analysis laboratory to require communication directly with the plant chemistry group; Discussion of the event with plant chemistry and warehousing personnel. This event posed no threat to the safety of Plant Personnel or the Public.

Plant Conditions

- a) Plant Mode - 1 Power Operations
- b) Power Level - 58%

Event Description

On August 8, 1990, during the power ramp portion of a plant startup, it was discovered that the monthly diesel generator fuel oil analysis for Diesel Fuel Oil Tank 1B had apparently not been completed within the required seven day time frame. During the course of accounting for the newly received diesel fuel oil surveillance documentation, a plant chemistry craft supervisor discovered that the Technical Specification required monthly sample results for Diesel Fuel Oil Tank 1B particulate contamination (obtained on July 30, 1990) were not included. On August 9, 1990, communication with the Materials group confirmed that the sample results had not been received and that a violation of WNP-2 Technical Specifications had in fact occurred. When the material requirements engineer contacted the fuel oil analysis laboratory by telephone, he was informed that the analysis had not been performed.

Immediate Corrective Action

At the request of the material requirements engineer, the laboratory performed the Technical Specification required particulate contamination analysis immediately. The analysis results were received at 1250 hours on August 9, 1990, ten days after the sample was taken. The analytical results were within the prescribed Technical Specification requirements.

Further Evaluation and Corrective ActionA. Further Evaluation

1. This LER is written to document this event as reportable per the requirements of 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the Plants Technical Specifications.

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2. There were no structures, components or systems that were inoperable at the start of this event that contributed to the event.
3. The root causes of this event were evaluated as being:
 - a. Work Practices Less Than Adequate - Both the chemistry group and the material requirements group used work practices involving manual tracking methods to identify the need to obtain the Diesel Fuel Oil sample results within the seven day time limit. A log book was kept by the material requirements group and a second log book, a watch turnover sheet section devoted to surveillances in progress, and a file tracking system were used by the plant chemistry group. Due, in part, to the high work activity level associated with plant startup, none of these methods were successful in accomplishing their purpose of ensuring that an individual personnel error did not result in failure to comply with the requirements of Plant Technical Specifications. As a result, the failure of plant chemistry personnel to complete the diesel fuel oil analysis surveillance was not recognized until three days too late.
 - b. Procedure - Less Than Adequate - A combination of three separate procedures must be used to obtain a fuel oil sample, package it, and ship it to an off site laboratory for analysis. No one of these three procedures contains a complete flowpath for ensuring that the seven day requirement is met. All three of the procedures coordinated together do not contain a specific sequence of steps with a logical sequence of responsibility for the fuel oil sample at each point in the process which will ensure that the time requirement is met.

PPM 7.4.8.1.1.2.3, the Diesel Fuel Test Procedure, (one of the two plant chemistry procedures) does require a telephone call to the warehouse and the material requirements group, but no transfer of responsibility is mandated. Even though the Procurement Manual procedure, PM 4.2.10, contains a step which states that the material requirements engineer is to inform the chemistry supervisor and the technical supervisor if the seven day requirement is not met, it provides no methods to be used to discover this problem in advance of the time limit. Since the only active functions for the sampling and analysis process are performed by chemistry and warehousing, the addition of the Material Requirements group to the procedure accomplishes no specific function other than adding additional complexity to the process and providing an additional responsible party if the requirement is not met.

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PPM 7.4.8.1.1.2.3 originally contained a signoff step which called out the seven day time limit. Procedure Deviation 90-672 removed this step. The procedure no longer contains any reference to the seven day time requirement. None of the three procedures contains a signoff space specifically for ensuring that the seven day time requirement is met.

PPM 7.4.8.1.1.2.3 is awkward to use because the same procedure is used to perform both new fuel oil sampling and the monthly tank samples. The steps not performed for the type of sample being done must be marked "NA" and ignored. A temporary procedure, TP 12.5.30, was added in order to comply with a recently received Technical Specification change and to incorporate an improved method of sampling. This additional temporary procedure must be performed concurrently with PPM 7.4.8.1.1.2.3 in order to obtain a tank sample and transfer it to the warehouse. The combination of the two procedures is awkward and does not provide a reliable method for successfully completing the Technical Specification requirement.

B. Further Corrective Action

1. The temporary procedure for DG fuel oil sampling will be cancelled.
2. The single Technical Specification Surveillance Procedure for sampling both newly received fuel oil and accomplishing monthly tank sampling will be replaced by two separate procedures, one for each type of test.
3. The Technical Specification Surveillance Procedure will be improved to: 1) eliminate the material requirements group from the sampling process entirely, 2) provide a complete flowpath with definite identification of the plant chemistry group individual responsible to ensure compliance with the seven day time requirement, 3) provide a signoff space for receipt of the sample results within the seven day time limit, 4) remove steps requiring two action items with only one signoff and replace with two individual steps with signoffs, 5) record the freight bill number and sample number in the surveillance procedure.
4. The Procurement Manual Procedure for diesel fuel samples will be modified to eliminate the Material Requirements group from the process and instruct warehousing to deal directly with the plant chemistry group.
5. The purchase order for the offsite fuel oil analysis lab will be modified to specify that telephone contact be made with the plant chemistry group instead of the material requirements group.

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6. This event will be discussed with the members plant chemistry staff.

7. This event will be discussed with the members of the warehousing group.

Safety Significance

This event had no safety significance. The sample was taken properly and within the prescribed frequency. The analytical results were within the prescribed Technical Specification requirements. This event posed no threat to the safety of the Public or Plant Personnel.

Similar Events

LER 84-012 documents three similar events. Due to a misunderstanding between the Supply System and the laboratory performing the analysis concerning payment and expediting, three of the sample results were not received within the time required. The communication and funding problems with the laboratory were resolved.

EIIS InformationText Reference

Diesel Generator
Diesel Fuel Oil Tank 1B

EIIS Reference

System	Component
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EB	DG
DE	TK

