

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8710160230 DOC. DATE: 87/10/13 NOTARIZED: NO DOCKET #  
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
 AUTH. NAME AUTHOR AFFILIATION  
 SALAMON, G. Florida Power & Light Co.  
 WOODY, C. O. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 87-025-00: on 870914, GA dept noted that surveillance requirements of Tech Spec 4.1-2 Item 18 had not been met. Caused by inadequate procedure. Procedures. 3/4-osp-201.1 will be revised & surveillances performed. W/871013 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4  
 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

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	PD2-2 LA	1 1	PD2-2 PD	1 1
	McDONALD, D	1 1		
INTERNAL:	ACRS MICHELSON	1 1	ACRS MOELLER	2 2
	AEOD/DOA	1 1	AEOD/DSP/NAS	1 1
	AEOD/DSP/ROAB	2 2	AEOD/DSP/TPAB	1 1
	ARM/DCTS/DAB	1 1	DEDRO	1 1
	NRR/DEST/ADS	1 0	NRR/DEST/CEB	1 1
	NRR/DEST/ELB	1 1	NRR/DEST/ICSB	1 1
	NRR/DEST/MEB	1 1	NRR/DEST/MTB	1 1
	NRR/DEST/PSB	1 1	NRR/DEST/RSE	1 1
	NRR/DEST/SGB	1 1	NRR/DLPQ/HFB	1 1
	NRR/DLPQ/QAB	1 1	NRR/DOEA/EAB	1 1
	NRR/DREP/RAB	1 1	NRR/DREP/RPB	2 2
	NRR/DRIS/SIB	1 1	NRR/PMAS/ILRB	1 1
	<u>REG FILE</u> 02	1 1	RES DEPY GI	1 1
	RES TELFORD, J	1 1	RES/DE/EIB	1 1
	RGN2 FILE 01	1 1		
EXTERNAL:	EG&G GROH, M	5 5	H ST LOBBY WARD	1 1
	LPDR	1 1	NRC PDR	1 1
	NSIC HARRIS, J	1 1	NSIC MAYS, G	1 1

## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)  
Turkey Point Unit 3DOCKET NUMBER (2)  
0 5 0 0 0 2 5 0PAGE (3)  
1 OF 0 3TITLE (4)  
Undocumented Surveillance of Coolant Loop  
Operability Due to Inadequate ProcedureEVENT DATE (5)  
MONTH DAY YEAR  
0 9 1 4 8 7  
LER NUMBER (6)  
YEAR SEQUENTIAL NUMBER REVISION NUMBER  
8 7 - 0 2 5 - 0 0  
REPORT DATE (7)  
MONTH DAY YEAR  
1 0 1 3 8 7  
OTHER FACILITIES INVOLVED (8)  
FACILITY NAMES  
Turkey Point Unit 4  
DOCKET NUMBER(S)  
0 5 0 0 0 2 5 1  
0 5 0 0 0OPERATING MODE (9)  
POWER LEVEL (10)  
0 3 0  
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)  
20.402(b) 20.406(c) 50.73(a)(2)(iv) 73.71(b)  
20.406(a)(1)(i) 50.38(c)(1) 50.73(a)(2)(v) 73.71(c)  
20.406(a)(1)(ii) 50.38(c)(2) 50.73(a)(2)(vi) OTHER (Specify in Abstract below and in Text, NRC Form 365A)  
20.406(a)(1)(iii) X 50.73(a)(2)(i) 50.73(a)(2)(vii)(A)  
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  
Gabe Salamon, Compliance Engineer  
TELEPHONE NUMBER  
3 0 5 2 4 6 - 6 5 6 0  
AREA CODECOMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)  
CAUSE SYSTEM COMPONENT MANUFACTURER REPORTABLE TO NPDs  
CAUSE SYSTEM COMPONENT MANUFACTURER REPORTABLE TO NPDsSUPPLEMENTAL 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)

On September 14, 1987, the Quality Assurance department noted that the surveillance requirements of Technical Specification (TS) 4.1-2 item 18 had not been met. This TS requires that with average coolant temperature less than 350 degrees F, a second coolant loop is to be verified operable once every 7 days. TS 3.4.1.e requires that "with average coolant temperature less than 350 degrees F, at least 2 coolant loops shall be operable or immediate corrective action must be taken to return two coolant loops to operable as soon as possible." Even though no documented surveillance in accordance with TS 4.1-2 item 18 was being performed, compliance with TS 3.4.1.e assures an ongoing observation of coolant loop operability for two coolant loops. The cause of the undocumented surveillance was an inadequate procedure. Procedures 3/4-OSP-201.1, "RCO Daily Logs", were upgrades of the RCO Log Sheet. Upon completion of 3/4-OSP-201.1, the old RCO Log Sheets, which addressed this surveillance, were cancelled. The upgraded procedures failed to include this surveillance requirement. Transition Documents (TD) were not generated, as the old RCO Log Sheets were not considered to be procedures. TD's will be generated for all future procedure upgrades. Existing upgraded procedures which were generated without a TD will have a TD generated.

JER 11/1

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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 7	— 0 2 5	— 0 0	0 2	OF	0 3

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

EVENT

On September 14, 1987, with Unit 3 in mode 1 at 30% power, the Quality Assurance department issued a Corrective Action Request (CAR) noting that the surveillance requirements of Technical Specification (TS) 4.1-2 item 18 had not been met. This TS requires that at shutdown, with average coolant temperature less than 350 degrees F, a second coolant loop is to be verified operable once every 7 days. The CAR noted that during the most recent Unit 3 startup, it was discovered through observation by the Quality Assurance department that this surveillance was not being documented. Technical Specification 3.4.1.e requires that "with average coolant temperature less than 350 degrees F, at least two coolant loops shall be operable or immediate corrective action must be taken to return two coolant loops to operable as soon as possible." Even though no documented surveillance in accordance with TS 4.1-2 item 18 was being performed, compliance with TS 3.4.1.e requires and assures an ongoing and continuous observation of coolant loop operability for two coolant loops. Procedure 3/4-OSP-201.1 "RCO Daily Logs", was issued on March 27, 1987. Since that time and prior to the issuance of the CAR, both Units 3 and 4 have been in modes which are subject to this surveillance.

CAUSE OF EVENT

The cause of the undocumented surveillance was an inadequate procedure. Procedures 3/4-OSP-201.1, "RCO Daily Logs", were upgrades based on the previous RCO Log Sheet and the need to incorporate certain additional requirements into the logs. Upon completion of 3/4-OSP-201.1, the old RCO Log Sheets became obsolete and were no longer used. The old RCO Log Sheet addressed this surveillance, however it was incorrectly identified as being required by TS 4.1-2 item 20. During the preparation of 3/4-OSP-201.1, the procedure writer could not locate item 20 in the TS, and incorrectly assumed that this surveillance was not required by Technical Specifications.

The usual process of procedure upgrade and review involves the generation of a Transition Document (TD). The TD's purpose is to identify point-by-point specifically how each step in an obsolete procedure is incorporated into the new procedure. In this instance, though the old RCO Log Sheets were formal documents, they were not considered to be procedures. As they were not procedures, no TD was generated, thus making less visible the deletion of the TS 4.1-2 item 18 surveillance. This was not discovered in the normal review process because neither the TD's nor the cancelled procedures/documents are included in the routed review package.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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 7	— 0 2 5	— 0 0	0 3	OF	0 3

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

ANALYSIS OF EVENT

Even though no documented surveillance in accordance with TS 4.1-2 item 18 was being performed during this event, compliance with TS 3.4.1.e requires and assures an ongoing and continuous observation of coolant loop operability for two coolant loops. The plant was in compliance with TS 3.4.1.e during the time of this event. Based on the above, the health and safety of the public were not affected.

CORRECTIVE ACTIONS

- 1) Procedures 3/4-OSP-201.1 will be revised.
- 2) The surveillances will be performed prior to the revision of 3/4-OSP-201.1, as required.
- 3) Transition Documents will be generated for all future procedure upgrades.
- 4) Existing upgraded procedures which were generated without the benefit of a TD, will now have a TD generated in order to assure that no other requirements have been similarly missed.
- 5) Future procedure upgrade review packages will include both the TD and the cancelled procedure in the review package.

ADDITIONAL DETAILS

Similar occurrences: No previous undocumented surveillances were caused by deletion of the surveillance requirement through an inadequate revision of a procedure. However, the plant has identified missed surveillances previously in LER's 250-86-027, 250-85-028, 250-85-001, and 250-87-019.

USNRC-DS  
1987 OCT 17 A 10:03

**FPL**

OCTOBER 13 1987

L-87-408  
10 CFR 50.73

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

Gentlemen:

Re: Turkey Point Unit 3  
Docket No. 50-250  
Reportable Event: 87-25  
Date of Event: September 14, 1987  
Undocumented Surveillance of Coolant Loop  
Operability Due to Inadequate Procedure

The attached Licensee Event Report is being submitted pursuant to the requirements of 10 CFR 50.73 to provide notification of the subject event.

Very truly yours,

*R. J. Acosta*  
*for*  
C. O. Woody  
Group Vice President  
Nuclear Energy

COW/SDF/gp

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

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1/1