

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8711060016 DOC. DATE: 87/11/02 NOTARIZED: NO DOCKET #
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 AUTH. NAME AUTHOR AFFILIATION
 WAGER, V. Florida Power & Light Co.
 WOODY, C. O. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 87-026-00: on 871002, discovered that hydrogen recombiner line inadequately tested after piping mod. Caused by deletion of requirement for testing in Administrative Site Procedure ASP-2. Recombiner line tested & ASP-2 revised. W/871102 ltr.

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

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	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/RSB	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 3										DOCKET NUMBER (2) 0 5 0 0 0 2 5 10										PAGE (3) 1 OF 3										
TITLE (4) Inadequate Testing Of The Hydrogen Recombiner Line After Piping Modification																														
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)															
									N/A						0 5 0 0 0															
1	0	0	2	8	7	8	7	0	2	6	0	0	1	1	0	2	8	7	N/A						0 5 0 0 0					
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																												
5		20.402(b)				20.406(c)				50.73(a)(2)(iv)				73.71(b)																
POWER LEVEL (10)		0 0 0				20.406(a)(1)(i)				50.73(a)(2)(v)				73.71(c)																
		20.406(a)(1)(ii)				50.38(c)(1)				50.73(a)(2)(vii)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)																
		20.406(a)(1)(iii)				50.38(c)(2)				50.73(a)(2)(viii)(A)																				
		20.406(a)(1)(iv)				X 50.73(a)(2)(i)				50.73(a)(2)(viii)(B)																				
		20.406(a)(1)(v)				50.73(a)(2)(ii)				50.73(a)(2)(ix)																				
LICENSEE CONTACT FOR THIS LER (12)																														
NAME										TELEPHONE NUMBER																				
Virgil Wager, Licensing Engineer										AREA CODE		3 1 0 5 2 4 6 1 - 6 4 7 1 6																		
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																														
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC																				
D	B	D	P	E	N					N																				
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)

During the Unit 3 refueling outage while the unit was in Mode 6, Plant Change Modification (PC/M) 81-157 was implemented to change the motor operator rotor for MOV-3-1426, from a 2 pole rotor to a 4 pole rotor. The modification required a larger motor cover to be installed but it could not be set in place due to interference from the hydrogen recombiner line in close proximity to MOV-3-1426. The line was rerouted per Change Request 15. The welded joint was penetrant tested and visually inspected. The line is open ended and cannot be isolated. It was incorrectly determined that a pressure test was not required. Unit 3 entered Mode 4 on Aug 21, 1987 and continued the unit startup into power operation. On Sept 25, 1987 the unit was shutdown due to operating problems unrelated to this event. The error regarding exemption from pressure testing was discovered during this shutdown. The hydrogen recombiner line was satisfactorily pressure tested during the shutdown. The Plant Construction Administrative Site Procedure (ASP) 2, has been revised to include the In Service Inspection Coordinator in the review cycle of Plant Change Modifications to class A, B, C systems to ensure adequate testing is performed after any modification.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

FACILITY NAME (1) Turkey Point Unit 3	DOCKET NUMBER (2) 0 5 0 0 0 2 5 0	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 7	0 2 6	0 0	0 2	OF	0 3

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

EVENT:

During the Unit 3 refueling outage while the unit was in Mode 6, Plant Change Modification (PC/M) 81-157 was implemented. This PC/M changed the motor operator for MOV 3-1426 (Steam Generator B Sample to the Analyzer) from a 2 pole rotor to a 4 pole rotor. This modification required a new and larger motor cover to be installed. The larger motor cover could not be set in place due to interference with an existing 2" hydrogen recombiner pipe in close proximity to MOV-3-1426. The construction Department stopped all work on the PC/M pending resolution of this problem. The problem was further identified on May 15, 1987 by the Startup Department with the issuance of a Discrepant Field Condition report (DFC 285-87). This DFC resulted in the issuance of a Non Conformance Report (NCR 611-87) on May 15, 1987. Engineering dispositioned NCR 611-87 on June 5 by rerouting the hydrogen recombiner line. The reroute was accomplished with PC/M Change Request 15 on June 18, 1987. The line was cut outside the containment building between penetration 53 and the first isolation valve HV-3-3 (locked closed), rerouted and welded. The welded joint was given a visual inspection and penetrant test. The construction process sheets require a pressure test be performed when piping systems are modified. It was determined that the hydrogen recombiner line was open ended and could not be isolated. Construction Procedure CFP-M2 R/2 was reviewed. Paragraph 7.2.2 of this procedure did not require open ended lines to be tested. A misinterpretation of the procedure (and ASME Code Section XI, IWC-5222) which defines the requirements of applicable codes, led to the deletion of the pressure test requirement from the process sheet governing the work. The change to the process sheet was approved by the Plant Nuclear Safety Committee. All work activities were completed and the system was turned over to the plant on July 13, 1987.

On August 21, 1987, at 1248, Unit 3 entered Mode 4, Hot Shutdown and continued the unit startup into power operation. The unit shutdown on September 25, 1987 at 1139 due to operating problems unrelated to this event. During this shutdown subsequent to the refueling outage, FPL's Authorized Nuclear Insurance Inspector determined the hydrogen recombiner line should have been tested as required by ASME Code Section XI, Code Case N-237-2, since it could become pressurized during an accident inside containment.

CAUSE OF EVENT:

Due to the fact that the hydrogen recombiner line is open ended and could not be isolated, it was incorrectly determined that a pressure test was not required after modification of the piping. This determination was made during the development of a Process Sheet in accordance with Administrative Site Procedure (ASP) -2. A misinterpretation of the requirements contained in CFP-M2 and ASME Code Section XI, IWC-5222, led to the deletion of the requirement from the Process Sheet governing the work. The review of Construction



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	05000250	87	026	00	03	OF	03

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

Procedure CFP-M2 R/2, Paragraph 7.2.2 and ASME Code Section XI, IWC-5222 reinforced the misinterpretation regarding exemption from pressure testing.

ANALYSIS OF EVENT:

The first isolation valve (HV-3-3) in the hydrogen recombiner line at penetration 53 is a manually operated valve and is locked closed during plant operation. The event did not impact the operability of the valve. There were no adverse affects on containment integrity. On September 30, 1987 during the outage subsequent to the refueling outage, DFC 469-87 was issued by FPL's Engineering Department (JPE) which resulted in the issuance of NCR 874-87 requiring a pressure test be performed on the hydrogen recombiner line at penetration 53. The piping was cut inside containment and a welded cap installed to isolate the line. The pressure test was performed, the results were satisfactory, and the line was restored. Based on the above the health and safety of the public were not affected.

CORRECTIVE ACTIONS:

- 1) DFC 469-87 and subsequently NCR 874-87 were issued; the NCR was dispositioned by JPE requiring performance of a pressure test on the hydrogen recombiner line in accordance with the requirements of ASME Code, Section XI.
- 2) Prior to the discovery of the event, during the normal review of Construction Procedures there was a concern that a potential existed for inadequate testing as required by the ASME code Section XI after modification of a system. The Plant Construction Administrative Site Procedure ASP-2 was revised on August 17, 1987 to include the In Service Inspection (ISI) Coordinator in the routing of the Process Sheets for review of changes to class A, B, C systems. In an effort to ensure this review is not inadvertently omitted and to further strengthen the accountability of the review ASP-2 will be revised to include a signature block for the ISI Coordinator on the Process Sheet.

ADDITIONAL DETAILS

None





NOVEMBER 02 1987

L-87-438
10 CFR 50.73

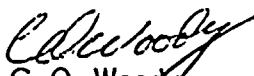
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Unit 3
Docket No. 50-250
Reportable Event: 87-26
Date of Event: October 2, 1987
Inadequate Testing Of The Hydrogen
Recombiner Line After Piping Modification

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,


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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