

## ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8807250226 DOC.DATE: 88/07/18 NOTARIZED: NO DOCKET #  
 FACIL:50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
 AUTH.NAME AUTHOR AFFILIATION  
 GROSS,K.W. Florida Power & Light Co.  
 CONWAY,W.F. Florida Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 88-012-00:on 880614,verification of fire detection  
 operability not performed as required by Tech Spec 3.14.  
 W/8 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED:LTR ( ENCL ) 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
EDISON,G	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 7E	1 0	NRR/DEST/CEB 8H	1 1
NRR/DEST/ESB 8D	1 1	NRR/DEST/ICSB 7	1 1
NRR/DEST/MEB 9H	1 1	NRR/DEST/MTB 9H	1 1
NRR/DEST/PSB 8D	1 1	NRR/DEST/RSB 8E	1 1
NRR/DEST/SGB 8D	1 1	NRR/DLPQ/HFB 10	1 1
NRR/DLPQ/QAB 10	1 1	NRR/DOEA/EAB 11	1 1
NRR/DREP/RAB 10	1 1	NRR/DREP/RPB 10	2 2
NRR/DREP/SIB 9A	1 1	NUDOCS-ABSTRACT	1 1
<del>REG EILE</del> 02	1 1	RES TELFORD,J	1 1
RES/DSIR DEPY	1 1	RES/DSIR/EIB	1 1
RGN2 FILE 01	1 1		
EXTERNAL: EG&G WILLIAMS,S	4 4	FORD BLDG HOY,A	1 1
H ST LOBBY WARD	1 1	LPDR	1 1
NRC PDR	1 1	NSIC HARRIS,J	1 1
NSIC MAYS,G	1 1		

TOTAL NUMBER OF COPIES REQUIRED: LTTR 45 ENCL 44

## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Turkey Point Unit 3										DOCKET NUMBER (2) 0 5 0 0 0 2 5 1 0										PAGE (3) 1 OF 0 3									
TITLE (4) Verification of Fire Detection-Operability Not Performed as Required by T. S. 3.14 Due to Weaknesses in Administrative Controls of Penetration Seal Surveillance Test																													
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	6	1	4	8	8	8	8	0	1	2	0	0	0	7	1	8	8	Turkey Point Unit 4						0 5 0 0 0 2 5 1					
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																										
POWER LEVEL (10)			20.402(b)				20.406(c)				50.73(a)(2)(iv)				73.71(b)														
1 0 0			20.406(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.71(c)														
			20.406(a)(1)(ii)				50.36(c)(2)				50.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)														
			20.406(a)(1)(iii)				50.73(a)(2)(ii)				50.73(a)(2)(vii)(A)																		
			20.406(a)(1)(iv)				50.73(a)(2)(iii)				50.73(a)(2)(viii)(B)																		
			20.406(a)(1)(v)				50.73(a)(2)(iv)				50.73(a)(2)(ix)																		
LICENSEE CONTACT FOR THIS LER (12)																													
NAME												TELEPHONE NUMBER																	
Karl W. Gross, Compliance Engineer												AREA CODE		3 1 0 1 5 2 4 6 1 1 1 3 0 1 0															
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																													
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS																			
.D	N, M	S, E, A, L	X, 9, 9, 9	No																									
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH		DAY		YEAR											
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)												<input checked="" type="checkbox"/> NO																	

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

On June 14, 1988 Turkey Point Units 3 and 4 were operating in mode 1 at approximately 100% power when an investigation identified a weakness in the controls for a specific surveillance performance which resulted in incomplete compliance with Technical Specification (TS) 3.14.5.b. The TS describes fire barrier availability and requires within one hour of identification of an inoperable penetration seal, initiation of an hourly fire watch and verification of operable detectors on one side of the affected barrier. For penetrations identified as deficient, actions to verify the operability of detector systems were not specifically performed. Areas of the plant subject to this TS have had fire watches performed. This event did not affect the health and safety of the public due to the existing fire watches and availability of detectors. The root cause of this event was personnel error by management, for not assuring the appropriate controls were used during the conduct of the Fire Barrier Penetration Seal surveillance. Corrective actions include a new surveillance procedure for examination of barriers, management emphasis of accountability for assigned duties, and an assessment of the control of outside organizations used for onsite support.

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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

TEXT (If more space is required, use additional NRC Form 368A's) (17)

Description of Event

On June 14, 1988, Turkey Point Units 3 and 4 were in mode 1 at 100% power when a Quality Assurance audit caused investigation into the delay in issuing a Fire Protection Impairment (FPI) form for four penetration seals (EIIS Code SEAL) in the unit 3 B switchgear room. (The FPI is used to track compliance with certain Fire Protection Technical Specifications.) The investigation identified weak administrative controls of the recent Fire Barrier Penetration Seal surveillance. The weakness identified resulted in incomplete compliance with Technical Specification (T.S.) 3.14.5.b.

Between December 7, 1987 and March 2, 1988 the penetration seal surveillance in accordance with TS 4.15.5.a.1 was conducted. Since then, Turkey Point units 3 and 4 were operated in various modes, including power operations.

Addition of the 10CFR50 Appendix R features caused procedure changes which led to conduct of the penetration seal surveillance using the construction/backfit organization, rather than a normal plant fire protection surveillance procedure. This caused the surveillance to be conducted with contractor personnel who performed the work in accordance with administrative controls used for construction/backfit activities. This resulted in not verifying detector operability within the one hour required by TS 3.14.5.b.

For deficient fire barrier penetration seals, TS 3.14.5 requires within one hour either initiation of a continuous fire watch, or an hourly fire watch and verification of an operable detector system on one side of the affected fire barrier. During the surveillance, (and continuing at this time) the areas of the plant affected by this TS have had fire watches performed at intervals of less than one hour. However, approximately 244 deficiencies were identified and verification of required detectors was not specifically performed.

Plant records for the period indicate that the fire detector systems were operable during this period. Routine alarm response and scheduled surveillances assured continuing detector system availability in the applicable areas.

As a result of the weaknesses associated with the conduct of this surveillance (i.e. use of construction/backfit controls), timeliness of the resolution of concerns identified in the surveillance further delayed TS required verification of detector system operability.

Cause of Event

The root cause of this event was that management did not assure that adequate controls were in place to complete the Fire Barrier Penetration Seal surveillance, in accordance with requirements. This resulted in not verifying detector operability within the one hour limit required by Technical Specification 3.14.5.b.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Turkey Point Unit 3	05000250	88	012	00	03	OF	03

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

This was a cognitive personnel error, contrary to an approved procedure, by non-licensed utility employees. No unusual characteristics of the work location contributed to this event.

### Analysis of Event

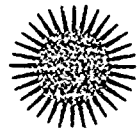
Review of plant logs and records indicates that the fire detection system in the areas governed by the TS were operable. Roving fire watches were also being conducted in the areas throughout the affected period. Based on this, the non-compliance was limited to not specifically performing the required verification of fire detection system operability within the period required by TS 3.14.5. Based on the above, the health and safety of the public was not affected.

### Corrective Actions

- 1) Management has and will continue to stress individual responsibility and accountability for compliance with TS requirements and performance of assigned duties. This will help to assure that the use of other organizations to complete work assignments will not result in the removal or transfer of accountability for the successful completion of the activity. This activity is ongoing and will continue as needed to assure appropriate performance.
- 2) The Quality Control department will review the control of outside organizations to assure that work is conducted consistent with the controls applied to similar activities performed by onsite groups. This review is scheduled for completion by October 1, 1988, and will result in the appropriate actions to resolve any identified concerns or deficiencies.
- 3) A fire protection impairment coordinator will be appointed to control fire protection impairments. He will maintain cognizance of system status and operability, and also provide assistance in assuring that appropriate Technical Specification requirements are complied with in a timely manner. This change will be implemented by August 1, 1988.
- 4) A Fire Barrier Penetration Seal Surveillance is being generated. The procedure will be in the form of a standard fire protection surveillance procedure incorporating specific acceptance criteria and implementing appropriate controls to ensure the timely initiation of actions to assure compliance with Technical Specification requirements. This procedure will be completed prior to the next performance of the surveillance, which has been scheduled for June 1, 1989.

### Additional Information

LER 250 88-008 reported a somewhat similar event related to the surveillance of emergency diesel generator fuel oil.



JULY 18 1988

L-88-302  
10 CFR 50.73

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

Gentlemen:

Re: Turkey Point Units 3 & 4  
Docket No. 50-250 and 50-251  
Reportable Event: 250-88-12  
Date of Event: June 12, 1988  
Verification of Fire Detection Operability. Not  
Performed as Required by Technical Specification 3.14  
Due to Weaknesses in Administrative Controls of  
Penetration Seal Surveillance Test

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

Very truly yours,

*W. F. Conway*  
W. F. Conway  
Senior Vice President-Nuclear

WFC/SDF/dmb

Attachment

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

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11

