

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8809070259 DOC.DATE: 88/08/29 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 88-015-00:on 880729,post accident hydrogen monitor sys
 deficiencies due to procedure & administrative weakness.
 W/8 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
	EDISON,G	1 1		
INTERNAL:	ACRS MICHELSON	1 1	ACRS MOELLER	2 2
	ACRS WYLIE	1 1	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/DRIS/SIB 9A	1 1
	NUDOCS-ABSTRACT	1 1	REG-FILE 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 46 ENCL 45

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Turkey Point Unit 3														DOCKET NUMBER (2) 0 5 0 0 0 2 5 0						PAGE (3) 1 OF 0 3	
TITLE (4) Post Accident Hydrogen Monitor System Deficiencies Due to Procedure and Administrative Control Weakness																					
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 7	2 9	8 8	8 8	0 1 5	0 0	0 8	2 9	8 8	Turkey Point Unit 4						0 5 0 0 0 2 5 1						
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) 1 0 0		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)				X 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)(x)											
LICENSEE CONTACT FOR THIS LER (12)																					
NAME Karl W. Gross, Compliance Engineer												TELEPHONE NUMBER AREA CODE 3 0 5 2 4 6 - 6 7 4 9									
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																					
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs					
D	I P	4 5	C 4 9 9																		
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR					
X YES (If yes, complete EXPECTED SUBMISSION DATE)												NO		1 2	3 1	8 18					

On July 29, 1988, Turkey Point Units 3 and 4 were operating at 100% power when a Quality Assurance audit identified that contrary to the requirements of Technical Specification (TS) surveillance requirement 4.18, plant surveillances did not verify three valves on each unit to be in the required position even though they are accessible. The valves are in the flow path to and from the hydrogen monitors from the the containment building. Also identified was a lack of direction to open a valve in each unit to initiate B train operation. The omission of two of the three valves from the flowpath verification was due to procedural weakness in the review of plant changes/modifications. The third valve in each unit was not verified due to inadequate administrative controls. An investigation into the presence of the valves which could prevent B train operation will be conducted and reported in a supplement. An instruction is being developed to provide a structured and consistent review process for plant modifications to assure procedures affected are identified. Procedures will be revised to verify valve position for the PAHM valves in accordance with Technical Specifications. Administrative controls which led to not verifying one valve in each unit are no longer in effect. The two B train PAHM valves (one per unit) are being removed from the PAHM system.

8809070259 880829
PDR ADCK 05000250
S PDC:

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

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 5	0 0	0 2	OF	0 3

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

Event Description

On July 29, 1988, Turkey Point Units 3 and 4 were operating at 100% power when a Quality Assurance audit identified that plant operations surveillance procedures 3- and 4-OSP-094.2, "Hydrogen Monitoring System Flowpath Verification" did not verify three valves on each unit to be in the required position even though they are accessible. This is contrary to the requirements of Technical Specification (TS) surveillance requirement 4.18.

The affected Post Accident Hydrogen Monitoring (PAHM) System (EIIS System code IP) valves and their normal positions are as follows:

Unit 3	Normal Position	Unit 4	Normal Position
PAHM-3-010A	Locked Open	PAHM-4-010A	Locked Open
-3-010B	Locked Open	-4-010B	Locked Open
-3-008B	Closed	-4-008B	Closed

The valves are in the flow path to and from the hydrogen monitors (EIIS Code 45) from the the containment building.

Turkey Point TS 4.18 requires plant personnel to "monthly, perform a system walkdown as specified in Table 4.18-1, to demonstrate the availability of required flowpaths by...verifying that each accessible valve is in its correct position...." The surveillance is required to be performed at all times. Contrary to this, the procedure which performs the PAHM system flowpath verification does not verify the listed valves' positions. Four of the valves, the -010 series which were locked open, are verified in the correct position during the conduct of another monthly surveillance procedure, 0-ADM-205 which is performed when the plant is not in cold shutdown or refueling.

The Quality Assurance audit also identified a lack of direction to open the PAHM-3 and -4-008B valves following an accident. This procedure deficiency could have prevented the B hydrogen analyzer of each unit from performing its design function. The PAHM B train systems were declared inoperable on August 22, 1988 in response to a review of this concern.

Cause of Event

The omission of the PAHM -008B valves from the flowpath verification was due to a programmatic deficiency in the drawing update process. These valves were added to the system drawing as a result of an as-built walkdown by the Drawing Update Group. Inadequate administrative controls existed at that time to ensure affected documents were updated.

The omission of the PAHM -010 valves was due to personnel error. The PAHM system did not include the -010 valves when the flowpath verification procedures were initially written. The -010 valves were added by plant modification on June 30, 1987 for unit 4 and August 3, 1987 for unit 3. When the plant modification packages were reviewed, procedures 3- and 4-OSP-094.2

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 8	0 1 5	0 0	0 3	OF	0 3

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

were not identified as being affected by the modification. Therefore the requirements to check valves PAHM-3-010A and B and PAHM-4-010A and B were not added to the procedures. This was a cognitive error by non-licensed utility personnel, contrary to plant procedures.

The PAHM-3 and -4-008B valves are being removed from the system. An investigation into these valves presence in the system is being conducted and will be discussed in a supplement to this LER.

Analysis of Event

The function of the PAHM is to monitor hydrogen concentration in the containment following postulated design basis events. The -010 series valves are locked open and have been verified in that position monthly when in other than cold shutdown or refueling. Based on this, the lack of verification of the -010A and B valves did not threaten the health and safety of the public.

The potential inability to operate the B train hydrogen monitors due to the presence of the closed -008B valves is being investigated. This will allow an assessment of the impact on plant safety and will be included in the supplement to this LER.

Corrective Actions

- 1) An instruction is being developed to provide a structured and consistent review process for plant modifications to assure all procedures affected are identified. This instruction will be implemented by August 31, 1988.
- 2) Procedures 3- and 4-OSP-094.2 will be revised to verify valve position for the -010 valves (two per unit) as identified above. This will be completed by August 31, 1988.
- 3) An investigation into the presence of the -008B valves in the PAHM system will be conducted. This will determine the basis for the valves presence and their impact on the system operability since the system was installed.
- 4) The PAHM-3 and -4-008B valves have been removed from the PAHM system.
- 5) The Drawing Update Program process no longer exists. The Plant Change/Modification process now controls all drawing changes.

Additional Information

The PAHM system was manufactured by Comsip, Inc, and is Model K-III.

No similar events have been reported.





AUGUST 29 1988

L-88-374
10 CFR 50.73

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

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Reportable Event: 250-88-15
Date of Event: July 29, 1988
Post Accident Hydrogen Monitor System Deficiencies
Due to Procedure and Administrative Control Weakness

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
Senior Vice President - Nuclear

WFC/SDF/gp

Attachment

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

SDF3.LER

IE22
11