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 LYONS,E. Florida Power & Light Co.  
 CONWAY,W.F. Florida Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 89-007-00:on 890316,missed surveillance of Unit 3  
 snubber due to weakness in snubber testing program.  
 W/8 ltr.

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## 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) Missed Surveillance of Unit 3 Snubber due to Weakness in the Snubber Testing Program																											
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									
0 3		1 6		8 9		8 9		0 0 7		0 0		0 4		1 7		8 9		DOCKET NUMBER(S) 0 5 0 0 0									
0 3		1 6		8 9		8 9		0 0 7		0 0		0 4		1 7		8 9		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)		1 0 0		20.402(b)						20.405(c)						50.73(a)(2)(iv)						73.71(b)					
				20.405(a)(1)(i)						50.36(c)(1)						50.73(a)(2)(v)						73.71(c)					
				20.405(a)(1)(ii)						50.36(c)(2)						50.73(a)(2)(vi)						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)(vii)(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 Edward Lyons, Compliance Engineer																TELEPHONE NUMBER AREA CODE 3 0 5 2 4 6 6 7 3 1											
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																	
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 March 16, 1989, with Unit 3 operating at 100 percent power, the Inservice Inspection (ISI) coordinator identified a snubber that had not been functionally tested during the previous Unit 3 refueling outage, as required by Technical Specification 4.14.1.d. The snubber is mounted on the 3A Residual Heat Removal (RHR) pump. The 3A RHR pump was declared inoperable at 1115, on March 16, 1989. The snubber was replaced with a spare snubber that had previously undergone successful functional testing, and at 1930, on March 16, 1989, the 3A RHR pump was returned to operable status. The snubber that had been removed was functionally tested with satisfactory results on March 17, 1989. The event was caused by a weakness in the snubber testing program that allowed a single mistake to go unchecked and resulted in the missed surveillance. The current ISI coordinator reviewed snubber test data from 1985 to 1987 for Unit 3, and 1986 to 1988 for Unit 4 to ensure that functional testing of other snubbers had not been missed. FPL will evaluate the process used for determination of snubber test population, and make revisions, as required, to prevent this type of failure in the future.

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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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 9	0 0 7	0 0	0 2	OF	0 3

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

## DESCRIPTION OF THE EVENT

On March 16, 1989 Unit 3 was operating at 100 percent power. While reviewing surveillance test data for Unit 3 snubbers in order to identify the test population for the next Unit 3 refueling outage, the Inservice Inspection (ISI) coordinator (non licensed utility personnel) identified a snubber that should have been functionally tested during the previous refueling outage. The snubber (at location 3-1027) (EIIS component: SNB) is located on the 3A Residual Heat Removal (RHR) pump (EIIS system: BP, component: P). The ISI coordinator notified the Operations Department, and at 1115, on March 16, 1989, the 3A RHR pump was declared inoperable. This placed Unit 3 in the action statement for Technical Specification 3.4.1.b which allows 24 hours to return the inoperable pump to operable status or be in hot standby within 6 hours. Technical Specification 3.4.1.b also requires that the operable RHR pump be tested to demonstrate operability prior to initiating maintenance of the inoperable pump. Operability testing of the 3B RHR pump was completed satisfactorily at approximately 1515, on March 16. The snubber at location 3-1027 was replaced with a spare snubber which had previously undergone satisfactory functional testing, and at 1930, the 3A RHR pump was returned to operable status. A functional test was performed on the snubber that had been removed, and it completed the test with satisfactory results on March 17, 1989.

## CAUSE OF THE EVENT

This event was caused by a weakness in the snubber testing program, in that, a single individual was responsible for determining the snubber test population, without review or verification. This allowed a single mistake to go unchecked, and resulted in the missed surveillance.

## ANALYSIS

Technical Specification 4.14.1.d states, "In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested." During the 1985 Unit 3 refueling outage, the snubber at location 3-1027 failed its functional test. At that time, a spare snubber was installed at location 3-1027. However, during the 1987 Unit 3 refueling outage (the next test period), the spare snubber that had been installed at location 3-1027 was not retested as required by the Technical Specifications. This snubber is mounted on the 3A RHR pump, therefore, the 3A RHR pump was declared inoperable.

Following identification of the missed surveillance, the snubber was replaced with a spare snubber, and the snubber that was removed was functionally tested. The results of the snubber functional test were satisfactory. Based on the above, there was no effect on the health and safety of the public.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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 9	0 0 7	0 0	3	OF	0 3

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

## CORRECTIVE ACTIONS

- 1) The snubber at location 3-1027 was removed and replaced with a spare snubber on March 16, 1989.
- 2) A functional test was performed on the snubber that was removed, with satisfactory results on March 17, 1989.
- 3) The ISI coordinator reviewed snubber test data from 1985 to 1987 for Unit 3, and 1986 to 1988 for Unit 4 to ensure that retesting of other snubbers had not been missed.
- 4) Snubber test data for Unit 3 and 4 has been transferred to a computer data base that will aid in identifying future snubbers requiring retest. The use of this data base resulted in the discovery of this missed surveillance and should prevent this type of event in the future.
- 5) The process used in determination of the population of snubbers to be tested will be analyzed and revised, as required, to prevent missed snubber surveillances in the future. This action, including any resulting procedure changes, will be completed by July 31, 1989.

## ADDITIONAL INFORMATION

Similar events involving delayed or missed surveillances were described in LERs 250-86-010, 250-86-013, 250-86-020, 250-86-027, 250-86-029, 250-87-025, 250-87-028, 250-88-006, 250-88-009, 250-88-014 and 251-88-005.



APRIL 17 1989

L-89-150  
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: 89-07  
Date of Event: March 16, 1989  
Missed Surveillance of Unit 3 Snubber  
Due to Weakness in the Snubber Testing Program

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,

W. F. Conway  
Senior Vice President - Nuclear

WFC/JRH/cm

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

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