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ACCESSION NBR: 8807010442 DOC. DATE: 88/06/24 NOTARIZED: NO DOCKET #
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 AUTH. NAME AUTHOR AFFILIATION
 HART, R.D. Florida Power & Light Co.
 CONWAY, W.F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 88-009-00: on 880527, QA discovered missed Tech Spec surveillances for sttio battery pilot cell rotation.

W/8 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED: LTR / ENCL / SIZE: 5
 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

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	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	
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	NRR/DEST/ADS 7E		1	0		NRR/DEST/CEB 8H		1	1	
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	NRR/DEST/SGB 8D		1	1		NRR/DLPQ/HFB 10		1	1	
	NRR/DLPQ/QAB 10		1	1		NRR/DOEA/EAB 11		1	1	
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	RES/DE/EIB		1	1		RES/DRPS DEPY		1	1	
	RGN2 FILE 01		1	1						
EXTERNAL:	EG&G WILLIAMS, S		4	4		FORD BLDG HOY, A		1	1	
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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 4			
TITLE (4) Quality Assurance Discovered Missed Technical Specification Surveillances for Station Battery Pilot Cell Rotation and EDG Fuel Oil Sampling Analysis																							
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 Turkey Point Unit 4					DOCKET NUMBER(S) 0 5 0 0 0 2 5 1									
0 5	2 7	8 8	8 8	0 0 9	0 0	0 6	2 4	8 8						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)				20.406(c)				50.73(a)(2)(iv)				73.71(b)									
		20.406(a)(1)(i)				50.36(e)(1)				50.73(a)(2)(v)				73.71(c)									
		20.406(a)(1)(ii)				50.36(e)(2)				50.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)									
		20.406(a)(1)(iii)				X 50.73(a)(2)(ii)				50.73(a)(2)(viii)(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 Randall D. Hart, Licensing Engineer										TELEPHONE NUMBER AREA CODE 3 0 5 2 4 6 - 6 5 5 9													
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		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS							
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) (10)

On May 27, 1988, while both Unit 3 and Unit 4 were at 100% power, it was determined that two (2) Technical Specification (TS) surveillance requirements had not been properly implemented in 1987. A routine audit by the Quality Assurance (QA) Department of the implementation of TS section 4.8, Emergency Power System Periodic Tests, discovered the missed TS requirements. TS 4.8.2.a requires the station battery pilot cell to be rotated on a monthly basis. The pilot cell was not rotated during the period April 1 through May 19, 1987 which exceeded the TS required surveillance interval. TS 4.8.1.b requires a quarterly sample of fuel oil for the emergency diesel generator (EDG) be verified to meet acceptable limits for viscosity, water and sediment. The results received to meet this TS in September, 1987 and February, 1988 were within limits but they were not received within the TS surveillance time limit. The root cause of these events was a combination of personnel error and procedure inadequacy. A Training Bulletin was issued to plant department heads to reemphasize the importance of work controls and following procedures. Appropriate procedure changes are also being made to prevent recurrence.

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

EVENT:

On May 27, 1988, while both Unit 3 and Unit 4 were at 100% power, it was determined that the Technical Specification (TS) requirement for station battery pilot cell rotation had been exceeded in May of 1987 and that the TS requirement for emergency diesel generator (EDG) fuel oil analysis had not been properly implemented twice in 1987. A routine audit by the Quality Assurance (QA) Department of the implementation of TS section 4.8, Emergency Power System Periodic Tests, discovered the missed TS requirements.

TS 4.8.2.a requires the station battery pilot cell to be rotated on a monthly basis. Operating Surveillance Procedure (OSP) 4-OSP-201.3, NPO Daily Logs, requires daily logging of the pilot cell number. Also, Enclosure 1 provides the pilot cell rotation schedule for the next several years. A review of completed copies of 4-OSP-201.3 from April 1, 1987 through May 19, 1987 indicated that the pilot cell recorded was number 33. According to Enclosure 1 pilot cell number 34 should have been recorded for the month of May 1987. The 49 days between pilot cell rotation for the station batteries exceeded the TS monthly time frame including a 25% grace period allowed by TS 4.0.1. Therefore this is a condition prohibited by TS.

TS 4.8.1.b states that at least once per 92 days a sample of diesel fuel oil from the fuel oil storage tank is verified to be within acceptable limits when checked for viscosity, water, and sediment. Nuclear Chemistry Procedure (NC) 103, Diesel Fuel Oil Inventory, Receiving Shipments and Periodic Sampling, implements the requirements of TS 4.8.1.b. A review of test analysis records indicated that for 2 TS intervals the required analysis was not performed within the time frame required. On May 6, 1987 satisfactory test results were received for the TS 4.8.1.b analysis. The next set of test results were not completed until September 18, 1987 which amounted to an interval of 135 days. This exceeded the TS requirement including a 25% grace period allowed by TS 4.0.1. A subsequent test was reported satisfactory on October 16, 1987 followed by a satisfactory test reported on February 15, 1988. The second interval was 122 days which also exceeded the TS requirement including the 25% grace period allowed by TS 4.0.1. Conversations with the vendor who performs the fuel oil analysis indicates that the actual analyses were satisfactorily completed in the lab prior to the required TS completion date. However, the actual test results were not transmitted to Turkey Point before the required date was exceeded.

CAUSE OF EVENT:

The battery surveillance is performed by Electrical Maintenance on a weekly basis, per O-SME-003.7, 125 VDC Station Battery Weekly Maintenance. The Operations Department is responsible for rotating the pilot cell on a monthly basis. Procedure 4-OSP-201.3 identifies which cell is to be surveilled by providing a schedule for the rotation of the pilot cell and requires the Nuclear Plant Operator (NPO) to log on a daily basis the cell number of the pilot cell.

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

An investigation into the first finding revealed contributing root causes. One root cause was the failure of the NPO to verify that the pilot cell was the same one as identified by the rotation schedule. The other root cause was that neither of the above procedures specifically stated whether the Electrical or Operations Department had the responsibility for rotating the pilot cell. Procedure O-SME-003.7 states that Electrical Maintenance is to notify the Nuclear Watch Engineer if the pilot cell has not been rotated and that Operations rotates the pilot cell monthly. 4-OSP-201.3 recorded the number and provided the rotation schedule for the pilot cell, however, it did not contain a specific step for rotating the pilot cell.

The root cause for the missed EDG fuel oil analysis results was due in part to the purchase order used to procure the vendor services not providing clear and specific guidance on the turn around time for sample results to meet TS requirements and the procedure for scheduling TS surveillances not addressing this TS requirement. Another contributor was personnel error in that the follow up to ensure that the samples were analyzed and reported within the required TS time frame was not done.

ANALYSIS OF EVENT:

During the event for the pilot cell rotation, the log readings taken did not indicate any abnormal performance on the part of the station battery. Reviews of previous and subsequent logs indicated no other occurrences of missed pilot cell rotation during the audit period of 1987.

The EDG fuel oil sample results were received after the TS required date, but the analysis showed that the EDG fuel oil met the TS requirements. Therefore, the fuel oil was acceptable for use for the EDGs and did not have an affect on operability of the unit. Based on the above, the health and safety of the public were not affected.

CORRECTIVE ACTIONS:

- 1) O-SME-003.2, 125 VDC Station Battery Monthly Maintenance, has been revised to require the Electrical Maintenance Department to rotate the pilot cell monthly.
- 2) Training Information Bulletin number 88-02 was issued on June 6, 1988 to plant department heads. This bulletin provided information on work controls and the importance of complying with plant procedures that implement work controls.
- 3) The involved chemistry personnel will be counseled on the importance of ensuring that surveillances are performed on time and as required by procedure. This will be accomplished by July 15, 1988.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

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

- 4) The PO used for procuring the vendor analysis will be revised to specify a required completion date and notification to the plant upon completion of the required analysis. This will be accomplished by July 29, 1988.
- 5) NC-103 will be revised to clarify the guidance provided to meet TS 4.8.1.b. This will be accomplished by July 29, 1988.

ADDITIONAL DETAILS:

Similar Occurrences: LERs 250-86-010, 250-86-011, 250-86-013, 250-86-020, 250-86-027, 250-86-029, 250-87-013, 250-87-025, 250-87-028, 250-88-006, and 251-88-005.



JUNE 24 1988

L-88-270
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: 250-88-09
Date of Event: May 27, 1988
Quality Assurance Discovered Missed Technical
Specification Surveillances for Station Battery
Pilot Cell Rotation and EDG Fuel Oil Sampling Analysis

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

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