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ACCESSION NBR:8810250503 DOC.DATE: 88/10/20 NOTARIZED: NO DOCKET #
FACIL:50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
AUTH.NAME AUTHOR AFFILIATION
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CONWAY,W.F. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 88-022-00:on 880920,diesel generators inoperable due to planned maint & fuel filter flow restriction.W/881020 ltr. W/8 ltr.

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

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NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Turkey Point Unit 3	0 5 0 0 0 2 5 0	1 OF 0 3

TITLE (4)
Diesel Generators Inoperable Due to Planned Maintenance and Fuel Filter Flow Restriction

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 9	2 0	8 8	8 8	— 0 2 2	— 0 0	1 0	2 0	8 8	Turkey Point Unit 4	0 5 0 0 0 2 5 1
										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)	X 50.36(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	TELEPHONE NUMBER
Karl W. Gross, Compliance Engineer	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	MANUFAC-TURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS	
D	E K	D G	E 1 4 7	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)

On September 20, 1988 at 2245 the A Emergency Diesel Generator (EDG) was declared out of service due to high fuel oil pressure. At the time, Unit 3 was at 100 percent power in Mode 1, Power Operations, and Unit 4 was in Mode 4, Hot Shutdown. The B EDG was out of service since September 17, 1988 for maintenance. Both EDGs inoperable simultaneously is prohibited by TS and outside the design basis for the plant. The criteria for fuel oil pressure was less than or equal to 40 psi, while the measured value during the daily test was 41 psi. A work order was issued for replacement of the fuel oil filter elements. The root cause of the event was an excessive interval between fuel filter replacements which allowed the gradual buildup of particulates in the filter. The fuel oil filters were replaced and the EDG returned to an operable condition at 0235 on September 21, 1988. The EDG procedures will be reviewed to add alert ranges which initiate replacement of the filters when pressure falls within the alert range. The replacement of the EDG fuel filter will be incorporated into the quarterly preventive maintenance.

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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 2 2	— 0 0	0 2 OF 0 3

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

Event Description

On September 20, 1988 at 2245 the A Emergency Diesel Generator (EDG, EIIS component code DG, system code EK) was declared out of service due to excessive fuel filter inlet pressure, identified during conduct of a required surveillance. At the time of the event, Unit 3 was at approximately 100 percent power in Mode 1, Power Operations, and Unit 4 was in Mode 4, Hot Shutdown. The B EDG had been declared out of service on September 17, 1988 at 0030 for planned maintenance of its cooling system. Turkey Point Technical Specification (TS) 3.7.1, Electrical Systems, allows one EDG to be out of service for a period of up to seven days during power operations. The inoperability of both EDG's is not addressed and TS 3.0.1, which applies when other Limiting Conditions for Operation cannot be met, was applied. This is a condition prohibited by TS and reportable in accordance with 10CFR50.73(a)(2)(i). Operation of the plant with both diesel generators out of service is also a condition outside the design basis for the plant and the condition is also reportable in accordance with 10CFR50.73(a)(2)(ii).

The A emergency diesel generator was being tested daily in accordance with TS 3.7.2.b when the described condition was recorded. The surveillance acceptance criteria for fuel oil pressure was less than or equal to 40 pounds per square inch (psi), while the measured value was 41 psi. Following identification of the condition, a work order was issued for replacement of the diesel fuel oil filter elements.

Operation of the plant outside of its design basis is also a reportable condition in accordance with 10CFR50.72(b)(1)(ii)(B). This was identified during Regulatory and Compliance Group review of a draft LER on October 14, 1988 at 1840, and the NRC Operations Center was notified at 1935 on October 14, 1988.

Cause of Event

The root cause of the event was an excessive interval between fuel filter replacements, which allowed the gradual buildup of particulates in the filter. The level of particulates in the fuel system did not exceed the manufacturers limits. The filter assemblies were scheduled for replacment in accordance with the manufacturers recommended maximum interval of 18 months. However, performance during the past two years resulted in a 12 month replacement interval.

Analysis of Event

The EDG supplier recommended limits for fuel oil pressure is from 10 pounds per square inch (psi) to 65 psi. The plant surveillance procedure restricts this range to less than or equal to 40 psi to assure EDG availability. The EDG continued to operate with the 41 psi measured during the surveillance. The EDG was conservatively declared out of service due to the pressure in excess of the surveillance procedure acceptance criteria.

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 2 2	— 0 0	0 3 OF 0 3

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

The EDGs provide an alternate emergency power supply to assure the continuing availability of the engineered safety systems in the event that offsite power is unavailable. The inoperability of the EDGs does not restrict the ability of the plant to respond to an accident while offsite power remains available. During the time the plant was in this condition, offsite power remained available to support response to any postulated accidents.

Corrective Actions

1) The fuel oil filters were replaced, and the EDG returned to an operable condition at 0235 on September 21, 1988.

2) The EDG operating procedures will be reviewed to add an alert range which initiates replacement of the fuel oil filters when pressure falls within the alert range prior to exceeding limits which require removal of the EDG from service. This will be completed by November 1, 1988.

3) The fuel oil filter replacement will be included in the quarterly preventative maintenance performed on the EDGs. This will be incorporated by November 30, 1988.

Additional Information

The Turkey Point EDGs were manufactured by the Electro-Motive Division of General Motors Corporation, model number 20-645E4, with fuel oil filters model number 3317989.

No previous similar events were identified.

P. O. BOX 14000, JUNO BEACH, FL 33408-0420

OCTOBER 2 0 1988

L-88-456
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: 250-88-22
Date of Event: September 20, 1988
Diesel Generators Inoperable Due to
Planned Maintenance and Fuel Filter Flow Restriction

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

Very truly yours,

W. F. Conway
Senior Vice President - Nuclear

WFC/RHF/gp

Attachment

cc: Malcolm L. Ernst, Acting Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

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