

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9009250236 DOC.DATE: 90/09/17 NOTARIZED: NO DOCKET #
 FACIL:50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 AUTH.NAME AUTHOR AFFILIATION
 POWELL,D.R. Florida Power & Light Co.
 HARRIS,K.N. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 90-017-00:on 900817,missed fire protection surveillance
 due to personnel error.

W/9 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 5
 TITLE: 50.73/50.9 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:	ACNW	2 2	AEOD/DOA	1 1
	AEOD/DSP/TPAB	1 1	AEOD/ROAB/DSP	2 2
	NRR/DET/ECMB 9H	1 1	NRR/DET/EMEB 7E	1 1
	NRR/DLPQ/LHFB11	1 1	NRR/DLPQ/LPEB10	1 1
	NRR/DOEA/OEAB11	1 1	NRR/DREP/PRPB11	2 2
	NRR/DST/SELB 8D	1 1	NRR/DST/SICB 7E	1 1
	NRR/DST/SPLB8D1	1 1	NRR/DST/SRXB 8E	1 1
	REG FILE 02	1 1	RES/DSIR/EIB	1 1
	RGN2 FILE 01	1 1		
EXTERNAL:	EG&G BRYCE,J.H	3 3	L ST LOBBY WARD	1 1
	NRC PDR	1 1	NSIC MAYS,G	1 1
	NSIC MURPHY,G.A	1 1	NUDOCS FULL TXT	1 1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

FULL TEXT CONVERSION REQUIRED
 TOTAL NUMBER OF COPIES REQUIRED: LTTR 31 ENCL 31

AO-4
 sub



Sept. 17, 1990
L-90-339
10 CFR 50.73

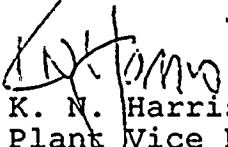
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Unit 3 and Unit 4
Dockets No. 50-250 and 50-251
Reportable Event: 90-017-00
Date of Event: March 10, 1990
Missed Fire Protection Surveillance
Due To Personnel Error

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,


K. N. Harris
Plant Vice President
Turkey Point Plant Nuclear

KNH/DPS/ds

attachment

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

00117

9009250236 900917
PDR ADOCK 05000250
S PDC

11/1
IE22

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) Missed Fire Protection Surveillance Due to Personnel Error																
---	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

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 8	1 7	9 0	9 0	0 1 7	0 0	0 9	1 7	9 0	Turkey Point Unit 4			0 5 0 0 0 2 5 1	
												0 5 0 0 0	

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)		20.408(a)		80.734(12)(h)		73.71(b)			
1 0 0		20.408(a)(1)(i)		80.38(a)(1)		80.734(12)(v)		73.71(a)			
		20.408(a)(1)(ii)		80.38(a)(2)		80.734(12)(vi)		<input checked="" type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 366A)			
		20.408(a)(1)(iii)		<input checked="" type="checkbox"/> 80.734(12)(i)		80.734(12)(vii)(A)		Special Report			
		20.408(a)(1)(iv)		80.734(12)(ii)		80.734(12)(vii)(B)					
		20.408(a)(1)(v)		80.734(12)(iii)		80.734(12)(ix)					

LICENSEE CONTACT FOR THIS LER (12)										TELEPHONE NUMBER			
NAME David R. Powell, Licensing Superintendent										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 NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)										EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
<input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)										<input type="checkbox"/> NO		1	1	3 9 0

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

On March 10, 1990, with Units 3 & 4 in Mode 1 (Power Operation) at 100 percent power, the 18 month periodicity of Technical Specification (TS) 4.15.5.a.1, including the 25 percent extension permitted by TS 4.0.1, was exceeded for the inspection of 14 dampers covered by 10 CFR 50, Appendix A and Appendix R. Therefore the dampers and their associated fire barriers were technically inoperable from March 10, 1990, until the dampers were inspected using procedure 0-SME-016.4, "Fire Damper Inspection." The missed surveillance of 10 of the dampers was discovered during a Quality Assurance (QA) inspection on August 17, 1990. The other four dampers were discovered on September 12, 1990, during a HVAC review to have also missed the March 10 due date. TS 3.14.5.b.2 requires that a special report be submitted if non-functional fire barriers are not restored to operable status within 7 days. This event was caused by inadequate procedural guidance and cognitive personnel error. Procedure 0-SME-016.4 has been revised to include the 14 Appendix A dampers. The first 10 dampers were inspected and determined to be functional on August 20, 1990. The other four dampers were inspected and determined to be functional on September 14, 1990. The results of the investigation concerning the four dampers, which were not in the fire damper inspection procedure, will be reported in a supplemental LER.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 0	— 0 1 7	— 0 0	0 2	OF	0 4

Turkey Point Unit 3

0 | 5 | 0 | 0 | 0 | 2 | 5 | 0

9 | 0

— | 0 | 1 | 7

— | 0 | 0

0 | 2

OF 0 | 4

TEXT: If more space is required, use additional NRC Form 302A's (117)

I DESCRIPTION OF EVENT

On March 10, 1990, with Units 3 & 4 in mode 1 (power operation) at 100 percent power, the 18 month periodicity of Technical Specification (TS) 4.15.5.a.1, including the 25 percent extension permitted by TS 4.0.1, was exceeded for the inspection of 14 dampers (VI/VF) (BDMP) covered by 10 CFR 50, Appendix A and Appendix R. Therefore the dampers and their associated fire barriers were technically inoperable from March 10, 1990, until the 14 dampers were inspected in accordance with TS 4.15.5.a.1. The missed surveillance on 10 of the dampers was discovered during a Quality Assurance (QA) inspection on August 17, 1990. Four dampers (two sets of two dampers each) were discovered during a review of HVAC drawings on September 12, 1990.

TS 3.14.5.a requires all fire dampers to be functional. TS 3.14.5.b.2 requires a Special Report if the fire barrier penetrations are not restored to functional status within seven days.

II CAUSE OF EVENT

1. Inadequate Procedure

Procedure 0-SME-016.4, "Fire Damper Inspection," did not cover all 10 CFR 50, Appendix R dampers.

The 14 Appendix A dampers involved in this event were installed and were being inspected in accordance with 10 CFR 50, Appendix A, before 10 CFR 50, Appendix R, was written. When Appendix R was issued, new fire dampers were installed to meet the new requirements. The 14 Appendix A dampers involved in this event met the Appendix R requirements, therefore were not part of the work package installing the new Appendix R dampers. A new procedure was written to provide the required inspections to the Appendix R dampers. This procedure, 0-SME-016.4, was written using the design change package that had installed the new Appendix R dampers. Therefore, the previously installed dampers were not included even though they were covered by the new Appendix R requirements.

2. Cognitive Personnel Error (non-licensed contract personnel)

On September 22, 1989, an independent contractor performing an Appendix R audit for FPL notified FPL that 10 Appendix A dampers were not covered by any plant procedures. Procedure 0-SME-016.4 was revised to include the 10 Appendix A dampers in December, 1989. Due to a cognitive personnel error by non-licensed contract

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	9 0	- 0 1 7	- 0 0 0	3	OF 0 4	

TEXT (If more space is required, use additional NRC Form 306A-1 (17))

personnel, the surveillance was not immediately scheduled and accomplished. The surveillance for the 10 Appendix A dampers identified by the audit was accomplished August 20, 1990, after a Quality Assurance (QA) audit identified that the surveillance had been missed.

3. Cognitive Personnel Error (non-licensed contract technician)

Procedure covering inspection of the 10 Appendix A dampers was canceled without adequately verifying that the dampers were covered by other procedures

On April 4, 1989, procedure 0-SME-016.3 "Fire Barrier Penetration Seal Inspection," was issued replacing procedure MP-15537.3, "Surveillance of Penetration Fire Barrier." The 10 fire barriers were covered by MP-15537.3. However, since Appendix R dampers were now covered by procedure 0-SME-16.4 and 0-SME-16.3 was to cover penetration seals only, when procedure MP-15537.3 was canceled, on April 4, 1989, the 10 fire dampers were no longer covered by any procedure.

4. The two sets of dampers discovered on September 12, 1990, were on a supplemental list when they were inspected in April, 1988. The results of an investigation to determine why they were not included in procedure MP-15537.3 will be included in a supplement to this LER.

III ANALYSIS OF EVENT

Between April 15 and April 19, 1988, all appendix R dampers installed were satisfactorily inspected in accordance with the requirements of TS 4.15.5.a.1.

During the time period the fire dampers were technically inoperable, an hourly fire watch patrol previously established from an earlier FPL commitment, was in effect. The surveillance performed on August 20, 1990, found no problems with the 10 fire dampers. The four dampers discovered on September 12, 1990, were satisfactorily inspected on September 14, 1990. These successful inspections provide a reasonable degree of confidence that the 14 dampers were capable of performing their intended function during the time period the dampers were technically inoperable. Thus, the health and safety of the public were not affected by this event.

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	9 0	— 0 1 7	— 0 0	0	4	OF 0 4

TEXT (If more space is required, use additional NRC Form 364A's) (17)

IV CORRECTIVE ACTIONS

1. The contract technician responsible for reviewing MP 15537.3 was admonished for not correctly verifying that all dampers included in that procedure were covered in other procedures or determined to not be required.
2. On December 19, 1989, procedure 0-SME-016.4 was revised to include the 10 Appendix A fire dampers.
3. On August 20, 1990, the first 10 fire dampers were inspected and found to be functional.
4. Fire Protection has designated a technician to ensure that Fire Protection TS required surveillances are completed as required.
5. In September, 1989, an independent contractor performed an audit of the Appendix R fire protection requirements. At that time, the 10 Appendix A dampers were the only dampers determined to have been left out of the 0-SME-016.4. Fire Protection is performing a review of HVAC drawings to determine if any other Appendix R dampers have been left out of this procedure. This review is expected to be completed by October 31, 1990. If any additional Appendix R dampers are discovered to have missed the March 10, 1990, due date, they will be reported in a supplemental LER.
6. In addition, Fire Protection will do a complete review of the material covered by the September, 1989, audit to ensure there are no other omissions. This review is scheduled to be complete by December 31, 1990.
7. The four additional dampers were added to procedure 0-SME-016.4 by use of an on-the-spot-change (OTSC) on September 13, 1990. These four dampers successfully passed the surveillance on September 14, 1990.
8. A supplemental LER will be submitted to report the results of the investigation as to why the four dampers were never incorporated into a procedure.

V ADDITIONAL INFORMATION

1. Similar Events

LER 250-88-012 described four fire barrier penetration seals identified as deficient that were not inspected within one hour as specified in the TS.

2. Failed Components

None

