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ACCESSION NBR:9012180043 DOC.DATE: 90/12/12 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.
 PLUNKETT,T.F. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 90-022-00:on 901114,discovered that Tech Spec required
 fire protection surveillance not performed within max
 allowed time interval.Caused by inadequate administrative
 controls.Memo issued.W/901212 ltr.

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EXTERNAL:	EG&G BRYCE,J.H	3 3	L ST LOBBY WARD	1 1
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L-90-431
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: 90-022
Date of Event: November 13, 1990
Fire Protection Surveillance Not Performed Within Technical
Specification Maximum Allowed Time Interval

The attached Licensee Event Report is being provided pursuant to the requirements of 10CFR50.73 to provide information on the subject event. Corrective Action # 4 corresponds to a corrective action previously identified in LER 50-250/90-020-0. The scheduled date for completion of this corrective action is being escalated by Turkey Point Nuclear Plant management from February 15, 1991 to January 18, 1991 due to the additional instance of a missed Technical Specification surveillance described herein.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear Plant

TFP/DRP/dwh

Attachment

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

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PDR ADOCK 05000250
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an FPL Group company

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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 1 OF 0 4										PAGE (3) 1 OF 0 4									
TITLE (4) Fire Protection Surveillance Not Performed Within Technical Specification Maximum Allowed Time Interval																													
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)															
1	1	3	9	0	0	1	2	1	2	9	0	Turkey Point Unit 4					0 5 0 0 0 2 5 1												
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																										
1			20.402(b)					20.405(c)					50.73(a)(2)(iv)					73.71(b)											
POWER LEVEL (10)			20.405(a)(1)(i)					50.38(c)(1)					50.73(a)(2)(v)					73.71(c)											
1 10 10			20.405(a)(1)(ii)					50.38(c)(2)					50.73(a)(2)(vi)					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)(vii)(A)																
			20.405(a)(1)(iv)					50.73(a)(2)(ii)					50.73(a)(2)(vii)(B)																
			20.405(a)(1)(v)					50.73(a)(2)(iii)					50.73(a)(2)(ix)																
LICENSEE CONTACT FOR THIS LER (12)																													
NAME										TELEPHONE NUMBER																			
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 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) (16)

On November 14, 1990, with Unit 3 and Unit 4 in Mode 1 at 100 percent power, FPL personnel discovered that a Technical Specification (TS) surveillance requirement had not been performed within the maximum allowed time interval. TS 4.15.4.a.1 requires the Unit 3 and Unit 4 fire hose stations to be visually inspected at least once per 31 days. TS 4.0.1 allows this specified interval to be adjusted plus or minus 25 percent to accommodate normal test schedules. The TS 4.15.4.a.1 surveillance requirement is implemented by performance of Appendix A to Maintenance Procedure (MP) 15537.5, "Fire Protection Equipment Surveillance." On November 13, 1990, Appendix A to procedure MP 15537.5 was performed as scheduled by Operating Surveillance Procedure 0-OSP-200.1, "Schedule of Plant Checks and Surveillances." Appendix A to procedure MP 15537.5 was previously performed on October 4, 1990, five days earlier than scheduled by procedure 0-OSP-200.1. The maximum time interval allowed by TS between these surveillances was exceeded. The cause for this condition was inadequate administrative controls. A non-cognitive error by a non-licensed utility individual contributed to this event. A memorandum concerning this event has been issued to plant departmental supervisors responsible for the performance of surveillances identified in procedure 0-OSP-200.1.



LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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Turkey Point Unit 3	0 5 0 0 0 2 5 0	9 0	- 0 2 2	- 0 0	0 2	OF	0 4

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

DESCRIPTION OF THE EVENT

On November 14, 1990, with Unit 3 and Unit 4 in Mode 1 at 100 percent power, FPL personnel discovered that a Technical Specification (TS) surveillance requirement had not been performed within the maximum allowed time interval.

TS 4.15.4.a.1 requires the Unit 3 and Unit 4 fire hose stations to be visually inspected at least once per 31 days. Per TS 4.0.1, this specified interval may be adjusted plus or minus 25 percent to accommodate normal test schedules.

The TS 4.15.4.a.1 surveillance requirement is implemented by performance of Appendix A to Maintenance Procedure (MP) 15537.5, "Fire Protection Equipment Surveillance." Procedure MP 15537.5 is scheduled by Operating Surveillance Procedure 0-OSP-200.1, "Schedule of Plant Checks and Surveillances," to be performed on the second Tuesday of each month. Depending on which day of the month the second Tuesday falls, the normal scheduled time interval between surveillances can be either 28 days or 35 days. The normal scheduled time interval between the October and November surveillances was 35 days.

For the month of October, procedure MP 15537.5 was scheduled to be performed on October 9, 1990. On October 4, 1990, Appendix A to procedure MP 15537.5 was completed five days earlier than scheduled. For the month of November, procedure MP 15537.5 was scheduled to be performed on November 13, 1990. On November 13, 1990, Appendix A to procedure MP 15537.5 was completed as scheduled. The total elapsed time interval between these surveillances exceeded the maximum time interval allowed by TS.

CAUSE OF THE EVENT

The cause for exceeding the maximum allowed TS interval between fire hose station surveillances was inadequate administrative controls. If surveillances are performed on the date scheduled by procedure 0-OSP-200.1, the surveillances will be performed within maximum time intervals allowed by TS. If a surveillance is not performed by the scheduled date, Control Room personnel will identify this condition during their daily review of procedure 0-OSP-200.1 scheduling sheets and track the surveillance to completion. However, if a surveillance is performed earlier than scheduled by procedure 0-OSP-200.1, no guidance or controls exist to ensure the maximum time interval allowed by TS is not exceeded.



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A contributing factor was a non-cognitive error by a non-licensed utility individual. Procedure 0-OSP-200.1 provides a schedule for performing TS required surveillances and identifies the department responsible for each surveillance. When the scheduled dates in procedure 0-OSP-200.1 are not met, the responsible plant departmental TS surveillance scheduler should ensure the interval between surveillances is within the maximum time interval allowed by TS.

ANALYSIS OF THE EVENT

Performance of Appendix A to procedure MP 15537.5 within the TS maximum allowed time interval demonstrates continued operability of the Unit 3 and Unit 4 fire hose stations. If the TS maximum allowed time interval between surveillances is exceeded, then the fire hose stations are technically inoperable. Appendix A to procedure MP 15537.5 was satisfactorily completed on November 13, 1990. Therefore, the Unit 3 and Unit 4 fire hose stations were in fact physically capable of performing their intended function.

CORRECTIVE ACTIONS

1. Appendix A to procedure MP 15537.5 was satisfactorily completed on November 13, 1990.
2. The requirement for performing TS surveillances within the maximum time interval allowed by TS was conveyed to the TS surveillance planner responsible for procedure MP 15537.5.
3. A memorandum has been issued to plant departmental supervisors responsible for the performance of surveillances identified in procedure 0-OSP-200.1. The requirement for performing TS surveillances within the maximum time interval allowed by TS was re-emphasized.
4. In Licensee Event Report (LER) 50-250/90-020-0, dated November 9, 1990, FPL committed to perform a management review of the generic problem of surveillance scheduling and tracking to determine applicable corrective actions to reduce the number of missed surveillances. The incident described in this LER will be included in the management review. The scheduled date for completion of the review is being escalated from February 15, 1991 to January 18, 1991 due to the additional instance of a missed TS surveillance described herein. A supplement to LER 50-250/90-020-0 will



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

be submitted to report the results of this management review and the corrective actions determined to be necessary.

ADDITIONAL INFORMATION

Incidents of missed TS surveillances have been reported in previous Licensee Event Reports (LERs). However, those incidents did not share the same root cause as identified in this LER.

