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ACCESSION NBR: 9204060253 DOC. DATE: 92/03/30 NOTARIZED: NO DOCKET #
 FACIL: 50-251 Turkey Point Plant, Unit 4, Florida Power and Light Co 05000251
 AUTH. NAME AUTHOR AFFILIATION
 KNORR, J.E. Florida Power & Light Co.
 PLUNKETT, T.F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-003-00: on 920224 & 27, discovered that component cooling water channel head drain valves not post installation tested per ASME Code & TS. Caused by personnel error. Personnel trained & records revised. W/920330 ltr.

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NOTES: NRR RAGHAVAN, L

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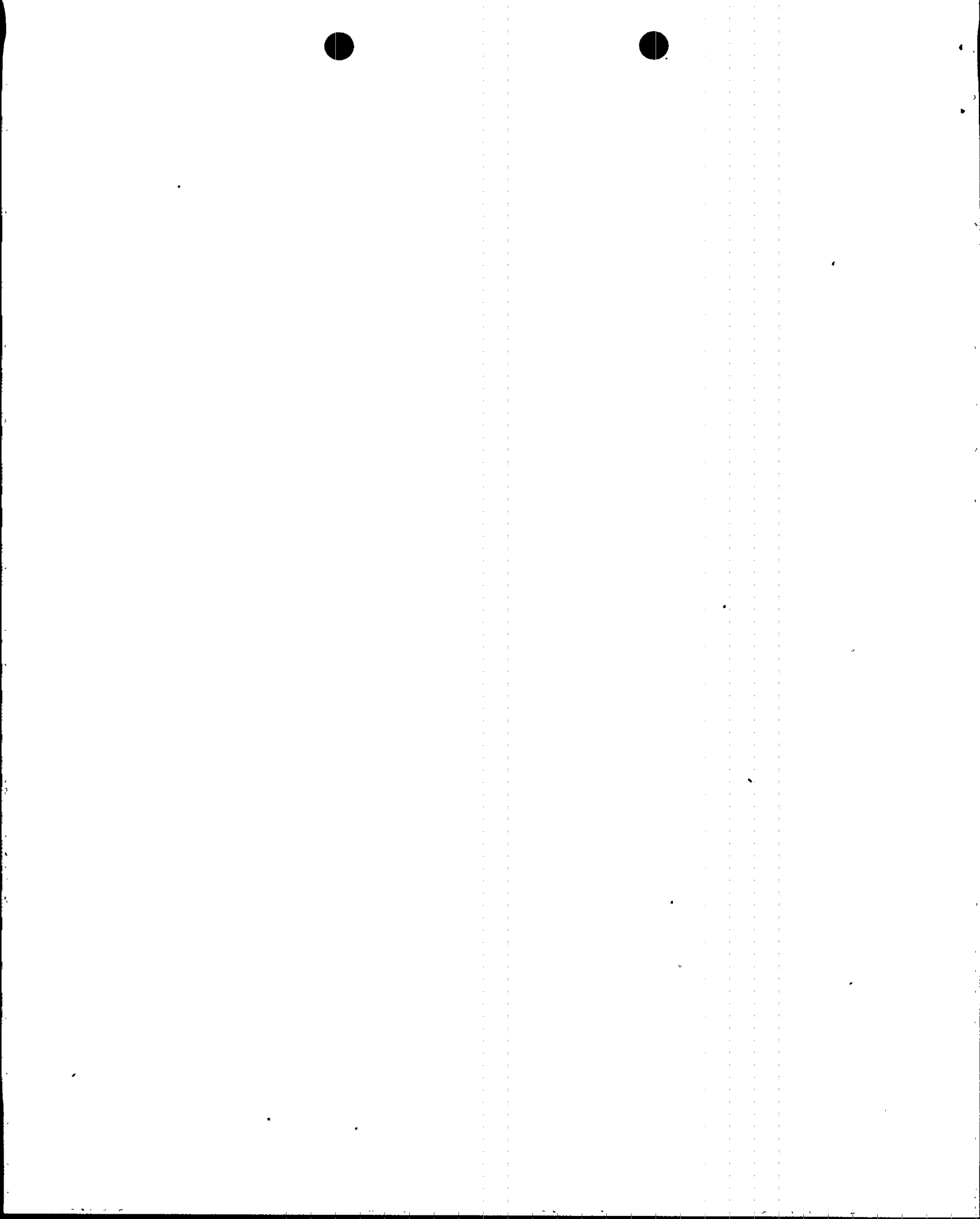
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	NRR/DST/SRXB 8E	1 1	REG FILE 02	1 1
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EXTERNAL:	EG&G BRYCE, J.H	3 3	L ST LOBBY WARD	1 1
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MAR 30 1992

L-92-090
10 CFR 50.73

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

Gentlemen:

Re: Turkey Point Unit 4
Docket No. 50-251
Reportable Event: 92-003-00
Component Cooling Water Channel Head Drain Valves not
Post-installation Tested in Accordance With Technical
Specification 4.0.5.

The attached Licensee Event Report 251-92-003-00 is being
provided in accordance with 10 CFR 50.73 (a) (2) (i) (B).

If there are any questions please contact us.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

TFP/JEK/jk

enclosures

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

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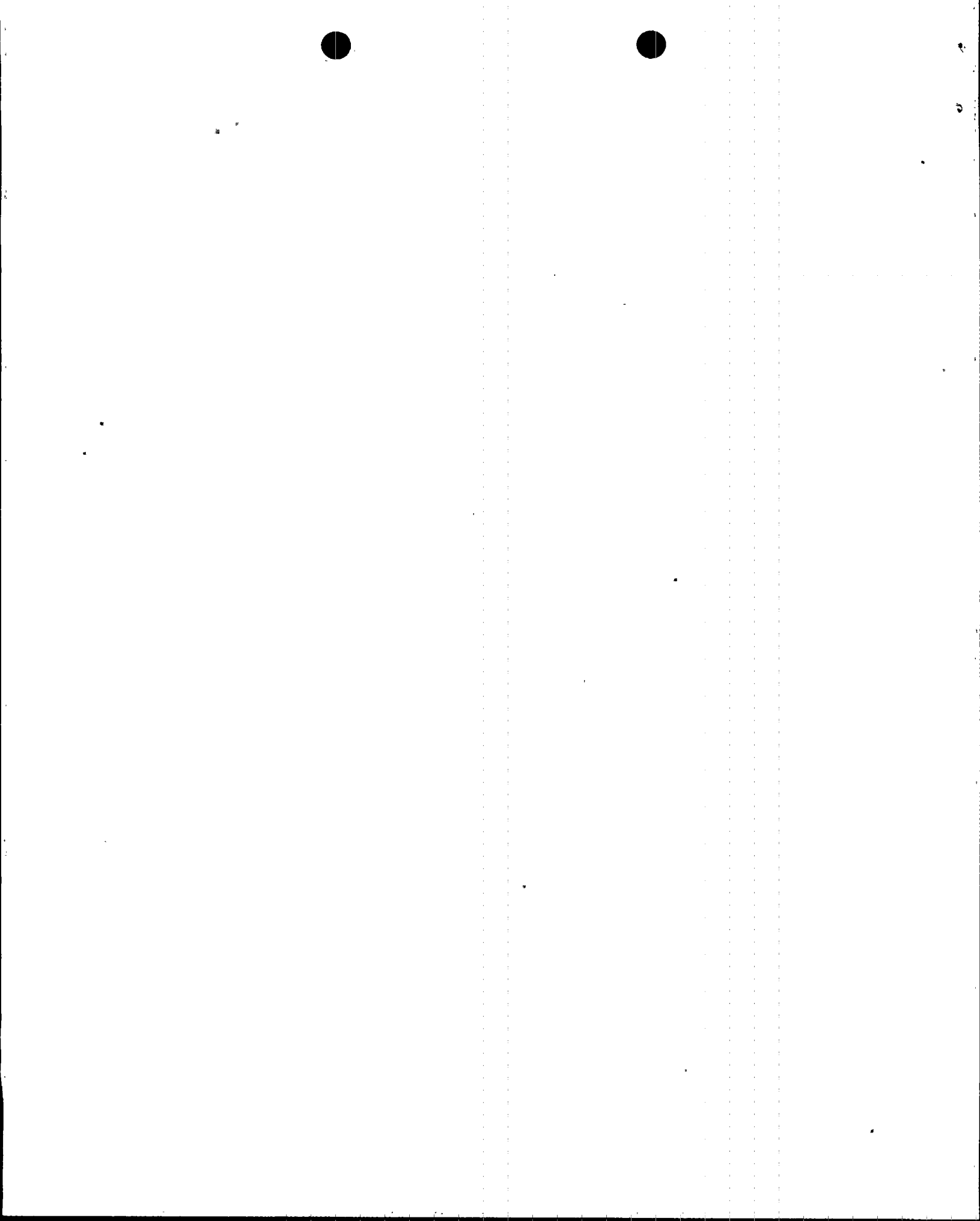
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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <div style="text-align: center;">TURKEY POINT UNIT 4</div>										DOCKET NUMBER (2) <div style="text-align: center;">05000251</div>		PAGE (3) <div style="text-align: center;">1 OF 3</div>	
TITLE (4) <div style="text-align: center;">Component Cooling Water Channel Head Drain Valves not Post-installation Tested in Accordance With Technical Specification 4.0.5.</div>													
EVENT DATE (5)			LER NUMBER (6)			RPT DATE (7)			OTHER FACILITIES INV. (8)				
MON	DAY	YR	YR	SEQ #	R#	MON	DAY	YR	FACILITY NAMES			DOCKET # (S)	
02	27	92	92	003	00	03	30	92					
OPERATING MODE (9)		1											
POWER LEVEL (10)		100											
<u>10 CFR 50.73(a)(2)(i)(B)</u>													
LICENSEE CONTACT FOR THIS LER (12)													
James E. Knorr, Regulation and Compliance Specialist										Telephone Number (305) 246-6757			
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)													
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	NPRDS?	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	NPRDS?				
SUPPLEMENTAL REPORT EXPECTED (14) <input checked="" type="radio"/> NO						YES		EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR	
(if yes, complete EXPECTED SUBMISSION DATE)													
ABSTRACT (16)													
<p>On February 24, 1992, during a review of post maintenance work, Florida Power and Light Company discovered that the post maintenance testing performed on a valve was not correct since, identifying the work as an ASME Section XI Repair/Replacement, was not identified on the work plan.</p> <p>A subsequent record review of similar valve repairs identified, on February 27, 1992, that post maintenance testing of valve 3-50-377 was also not in accordance with ASME Section XI Repair/Replacement requirements. The record review revealed that on October 18, 1991, the Unit 4 "A" CCW heat exchanger channel head drain valve (4-50-377) was replaced to repair a leak. Post maintenance testing was performed in accordance with a repair scope of valve packing adjustment as opposed to valve replacement prior to return of the heat exchanger to service.</p> <p>Since the work scope had changed and the quality group of the valve was not designated, testing in accordance with Technical Specification 4.0.5 "Surveillance Requirements for inservice testing of ASME Code Class 1, 2, and 3 components," was not completed prior to return of the heat exchanger to operation.</p> <p>Successful testing of valve 4-50-377 at nominal operating pressure and temperature was completed on February 27, 1992.</p>													



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I. EVENT DESCRIPTION

On February 24, 1992, during a review of post maintenance work on a similar valve (4-50-364), Florida Power and Light Company discovered that the post maintenance testing performed on valve 4-50-364 was not correct since the quality group, identifying the work as an ASME Section XI Repair/Replacement, was not identified on the work plan. The Component Cooling Water (CCW) heat exchanger associated with this valve had been out of service during the valve repair and remained so until the valve was tested in accordance with Section XI.

A subsequent record review of similar valve repairs identified, on February 27, 1992, that post maintenance testing of valve 3-50-377 was also not in accordance with ASME Section XI Repair/Replacement requirements. The record review revealed that on October 18, 1991, the Unit 4 "A" CCW heat exchanger channel head drain valve (4-50-377) (EIIS:CC) (Component:DRN-V) was replaced to repair a leak. Post maintenance testing was performed in accordance with the maintenance work package prepared for the original repair scope of work (valve packing adjustment as opposed to replacement) prior to return of the heat exchanger (EIIS-CC) (Component:HX) to service.

Since the work scope had changed and the quality group of the valve was not designated, testing in accordance with Technical Specification 4.0.5 "Surveillance Requirements for inservice testing of ASME Code Class 1, 2, and 3 components," was not completed prior to return to operation.

Successful testing of valve 4-50-377 at nominal operating pressure and temperature, in accordance with Administrative Procedure AP 190.90, "ASME Section XI Pressure Tests for Quality Group A, B, and C Systems/Components," was completed on February 27, 1992. The "A" CCW heat exchanger was considered operable at the successful completion of the test.

II. EVENT CAUSE

The cause was cognitive personnel error by non-licensed utility personnel. During the process of job planning for the replacement of valve 4-50-377, the quality group of the valve was not identified since the valve was quality related and therefore, an assumption was made by maintenance personnel that the quality related designation meant that the valve would not have a Quality Group A, B, or C designation. The correct quality group was Quality Group C (equivalent to Code Class 3). As a result of the missing classification designation on the work plan, the work package was not routed to Inservice Inspection personnel after the work scope change for the designation of the required inservice inspection needed prior to returning the system to service.

A contributing cause is the failure to revisit the additional needed post maintenance testing required after the change in work scope from packing adjustment to valve replacement.



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III. EVENT SAFETY ANALYSIS

Valve 4-50-377 is a drain valve on the Intake Cooling Water channel head of the Unit 4 "A" CCW heat exchanger. The valve is in a 1.5 inch drain line. Intake cooling water is brackish water from the circulating water canals at Turkey Point Plant. The normal operating pressure for the Intake Cooling Water system at this location is approximately 6 psig. An operability evaluation was conducted on the as-found condition of an untested drain valve on this header. Assuming the total failure of the valve in the open position as worst case, the "A" CCW heat exchanger Intake Cooling Water flow remains adequate and the heat exchanger is still operable. Therefore, the health and safety of plant personnel and the general public was not compromised.

IV. CORRECTIVE ACTIONS

1. Successful testing of valve 4-50-377 at nominal operating pressure and temperature in accordance with Technical Specification 4.0.5 was completed on February 27, 1992.
2. Maintenance personnel have been trained to verify the quality group designation for equipment by review of various related design documentation. These personnel have also been trained on the importance of reviewing the complete package for scope changes which could require post-maintenance testing changes. The initial and continuing training program for this work group will be revised to reflect the information in this Licensee Event Report prior to June 1, 1992.
3. Quality Control personnel have reviewed all ready to work Plant Work Orders to ensure that the quality groups specified are correct. Additionally, previous work plans for similar quality related equipment were reviewed to ensure correct specification of quality groups.
4. Records providing the quality group of this valve and similar valves installed on both Turkey Point Units 3 and 4 have been revised to reflect the correct status.

V. ADDITIONAL INFORMATION

Similar Events: LER 250-90-002, "Post-maintenance test not performed to establish operability of a phase A containment isolation valve after adjusting the valve stem packing due to personnel error."

