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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9205220124 DOC. DATE: 92/05/15 NOTARIZED: NO DOCKET #
 FACIL: 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 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 92-003-01: on 920224, 27 & 0313, post maint testing of valve & refueling water purification pump was not completed in accordance w/ASME requirements. Caused by cognitive personnel error. Valves tested successfully. W/920515 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: NRR RAGHAVAN, L

05000251 A

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EXTERNAL:	EG&G BRYCE, J.H	3 3	L ST LOBBY WARD	1 1
	NRC PDR	1 1	NSIC MURPHY, G.A	1 1
	NSIC POORE, W.	1 1	NUDOCS FULL TXT	1 1
NOTES:		1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

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MAY 15 1992

L-92-145
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: 92-003-01
Supplemental Licensee Event Report
Code Class Equipment Not Post-installation Tested in
Accordance With Technical Specification 4.0.5

The attached Supplemental Licensee Event Report 251-92-003-01 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

210046

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)

TURKEY POINT UNIT 4

DOCKET NUMBER (2)

05000251

PAGE (3)

1 OF 4

TITLE (4)

Code Class Equipment not Post-installation Tested in Accordance With
Technical Specification 4.0.5.

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 # (5)
02	27	92	92	003	01	05	15	92		

OPERATING MODE (9)

1

POWER LEVEL (10)

100

10 CFR 50.73(a)(2)(i)(B)

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) NO ☒ YES ☐

EXPECTED
SUBMISSION
DATE (15)

MONTH

DAY

YEAR

(if yes, complete EXPECTED SUBMISSION DATE)

ABSTRACT (16)

On February 24, 1992, during a review of post maintenance work, Florida Power and Light Company discovered that the post maintenance testing performed on valve 4-50-364 was not correct since designation of the work as an ASME Section XI Repair/Replacement was not identified on the work plan. The testing was completed prior to return to service.

Subsequent record reviews of other similar repairs identified, on February 27, 1992, and March 13, 1992 that post maintenance testing of valve 4-50-377 and refueling water purification pump 4P209, respectively, was also completed not in accordance with ASME Section XI Repair/Replacement requirements. The record reviews 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 and on April 3, 1992, 4P209 was overhauled. Post maintenance testing of 4-50-377 was performed in accordance with the repair scope of valve packing adjustment as opposed to valve replacement prior to return of the heat exchanger to service. Pump 4P209 was also tested in accordance with the testing outlined in the work package for the overhaul.

Since the work packages had not correctly identified the quality group of the valve or pump, 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 each piece of equipment to operation.

Successful testing of valve 4-50-377 at nominal operating pressure and temperature was completed on February 27, 1992. Successful testing of 4P209 was completed on April 24, 1992.



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I. EVENT DESCRIPTION

On February 24, 1992, during a review of post maintenance work, Florida Power and Light Company (FPL) 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. Valve 4-50-364 was tested prior to return of the heat exchanger to service.

A subsequent record review of similar valve repairs identified, on February 27, 1992, that post maintenance testing of valve 4-50-377 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.

On March 13, 1992, as part of the investigation of work completed involving code boundary drawings of safety related equipment begun after the Licensee Event Report on the CCW drain valves, FPL Quality Control identified that the Section XI post installation ISI examination was not performed on the Unit 4 Spent Fuel Pool Purification Pump (4P209) (EIIS-DA) (Component:P) after a new frame adapter was installed. A Non-conformance report was issued on March 13, 1992, discussing this issue and the original engineering evaluation on March 13, 1992 concluded that the parts installed did not function as part of the pressure boundary and, therefore, did not require ISI examination. Upon further evaluation (April 17, 1992) the parts were found to comprise a portion of the pressure boundary and, therefore, ISI examination was required. Technical Specification 4.0.5 requires that ASME Section XI testing and/or examination be performed on Class 1, 2, and 3 equipment. The lack of a post installation examination is a condition not allowed by Technical Specifications and reportable in accordance with 10 CFR 50.73 (a) (2) (i) (B).



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II. EVENT CAUSE

The cause of these events is cognitive personnel error by non-licensed utility personnel. During the process of job planning for these repairs and replacements, the quality group of the equipment was not identified since the equipment was quality related and therefore, an assumption was made by site personnel that the quality related designation meant that the equipment 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 plans, the work packages were not routed to Inservice Inspection personnel after completion of the work for the designation of the required inservice inspection needed prior to returning the system to service.

A contributing cause for the 4-50-377 issue is the failure to revisit the additional needed post maintenance testing required after the change in work scope from packing adjustment to valve replacement.

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.

The 4P209 pump was originally designed and installed in accordance with the system specifications of B31.1. This code did not require ASME code materials and therefore did not require ISI post installation testing in accordance with Section XI. The replacement frame adapter met the requirements of B31.1. Since the pump casing is directly supported from the pedestal, the frame adapter has a loading which is compressive in nature. Cast iron material is suitable for compressive loading. The original frame adaptor design has been reliable. The quality class of the pump was changed in the recent past and this quality class change required Section XI testing. However, the installed frame adapter met the requirements and intent of the original design code and, therefore, no operability concern existed. An ISI pressure test was successfully performed on the pump on April 24, 1992.

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.



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2. Successful testing of 4P209 at nominal pressure and temperature in accordance with Technical Specification 4.0.5 was completed on April 24, 1992.

3. Appropriate site 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 these personnel will be revised to reflect the information in this Licensee Event Report prior to June 1, 1992.

4. 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. The lack of a 4P209 pump frame adapter post installation test was found as a result of the this review.

5. 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."

