

## ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9211020078 DOC. DATE: 92/10/20 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 92-006-00: on 920927, identified that required  
 surveillance not performed per TS 4.5.2.b.1. Caused by  
 personnel error. All surveillances in sys verified to have  
 been performed per TS.W/921020 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4  
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES: NRR RAGHAVAN, L

05000251

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD2-2 LA	1 1	PD2-2 PD	1 1
AULUCK, R	1 1		
INTERNAL: ACNW	2 2	AEOD/DOA	1 1
AEOD/DSP/TPAB	1 1	AEOD/ROAB/DSP	2 2
NRR/DET/EMEB 7E	1 1	NRR/DLPQ/LHFB10	1 1
NRR/DLPQ/LPEB10	1 1	NRR/DOEA/OEAB	1 1
NRR/DREP/PRPB11	2 2	NRR/DST/SELB 8D	1 1
NRR/DST/SICB8H3	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	2 2	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:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK.  
 ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION  
 LISTS FOR DOCUMENTS YOU DON'T NEED!

FULL TEXT CONVERSION REQUIRED  
 TOTAL NUMBER OF COPIES REQUIRED: LTTR 30 ENCL 30

APD  
 [Signature]





FPL

P.O. Box 029100, Miami, FL, 33102-9100

OCT 20 1992

L-92-293  
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: 92-006-00  
Two Mode Change Surveillances Not Performed in Accordance  
with Technical Specifications

The attached Licensee Event Report 251-92-006-00 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

enclosure

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

300092

9211020078 921020  
PDR ADDCK 05000251  
S PDR

an FPL Group company



1

# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <b>TURKEY POINT UNIT 4</b>										DOCKET NUMBER (2) <b>05000251</b>		PAGE (3) <b>1 OF 3</b>		
TITLE (4) <b>Two Mode Change Surveillances Not Performed in Accordance with Technical Specifications</b>														
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)		
09	27	92	92	006	00	10	27	92	TURKEY POINT UNIT 3			05000250		
OPERATING MODE (9)		3		<b>THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § 10 CFR 50.73(a)(2)(i)(B)</b>										
POWER LEVEL (10)		0%												
LICENSEE CONTACT FOR THIS LER (12)														
James E. Knorr, Licensing Engineer										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 <input checked="" type="checkbox"/> YES <input type="checkbox"/>										EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
(if yes, complete EXPECTED SUBMISSION DATE)														
<p>ABSTRACT (16)    On September 27, 1992, Turkey Point Unit 4 entered Mode 4 from Mode 5 at 0931 hours. At 1330 hours on September 28, 1992, Turkey Point personnel identified that a required surveillance had not been completed prior to the entry into Mode 4. Technical Specification 4.5.2.b.1 requires that at least once each 31 days plant personnel verify that the Emergency Core Cooling System (ECCS) piping is full of water by venting the ECCS pump casings and accessible discharge piping. This requirement applies during Modes 1, 2, 3 and 4. This surveillance was completed for Unit 4 at 1720 hours on September 28, 1992 and Unit 3 at 1400 hours on September 29, 1992.</p> <p>As part of the corrective action process for the above described event, a standby feedwater pump surveillance was also found to be incomplete. This surveillance is required to be complete prior to the entry into Mode 3. Unit 4 entered Mode 3 from Mode 4 at 0248 hours on September 28, 1992. This surveillance procedure was completed on September 29, 1992.</p> <p>The root cause of the two missed surveillances was an error during the change of dates in a computerized surveillance tracking system. Corrective actions have been implemented to reduce the probability of this occurrence in the future.</p>														



e

1

# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME	DOCKET NUMBER	LER NUMBER	PAGE NO.
TURKEY POINT UNIT 4	05000251	92-006-00	02 OF 03

## I. EVENT DESCRIPTION

On September 27, 1992, Turkey Point Unit 4 entered Mode 4 from Mode 5 at 0931 hours. At 1330 hours on September 28, 1992, Turkey Point personnel identified that a required surveillance had not been completed prior to the entry into Mode 4. Technical Specification 4.5.2.b.1 requires that at least once each 31 days plant personnel verify that the Emergency Core Cooling System (ECCS) piping (EIIS-BP and BQ) is full of water by venting the ECCS pump casings (EIIS-BP and BQ, IEEE-P) and accessible discharge piping. This requirement applies during Modes 1, 2, 3 and 4. This surveillance is completed by implementation of operations support procedures 3/4-OSP-202.2, ECCS Venting. 4-OSP-0202.2 was completed at 1720 hours on September 28, 1992. 3-OSP-202.2 was completed at 1400 hours on September 29, 1992.

As part of the corrective action process, on September 29, 1992, a required surveillance, 0-OSP-074.3, 'A' Standby Feedwater Pump, was found to be incomplete. Technical Specification 4.7.1.6.2 requires a completion of the surveillance at least monthly to verify the operability of the standby feedwater pumps (EIIS-BA, IEEE-P) by testing in recirculation on a staggered basis. The surveillance is also required to be complete prior to the entry into Mode 3. Unit 4 entered Mode 3 at 0248 hours on September 28, 1992. This surveillance procedure was completed on September 29, 1992.

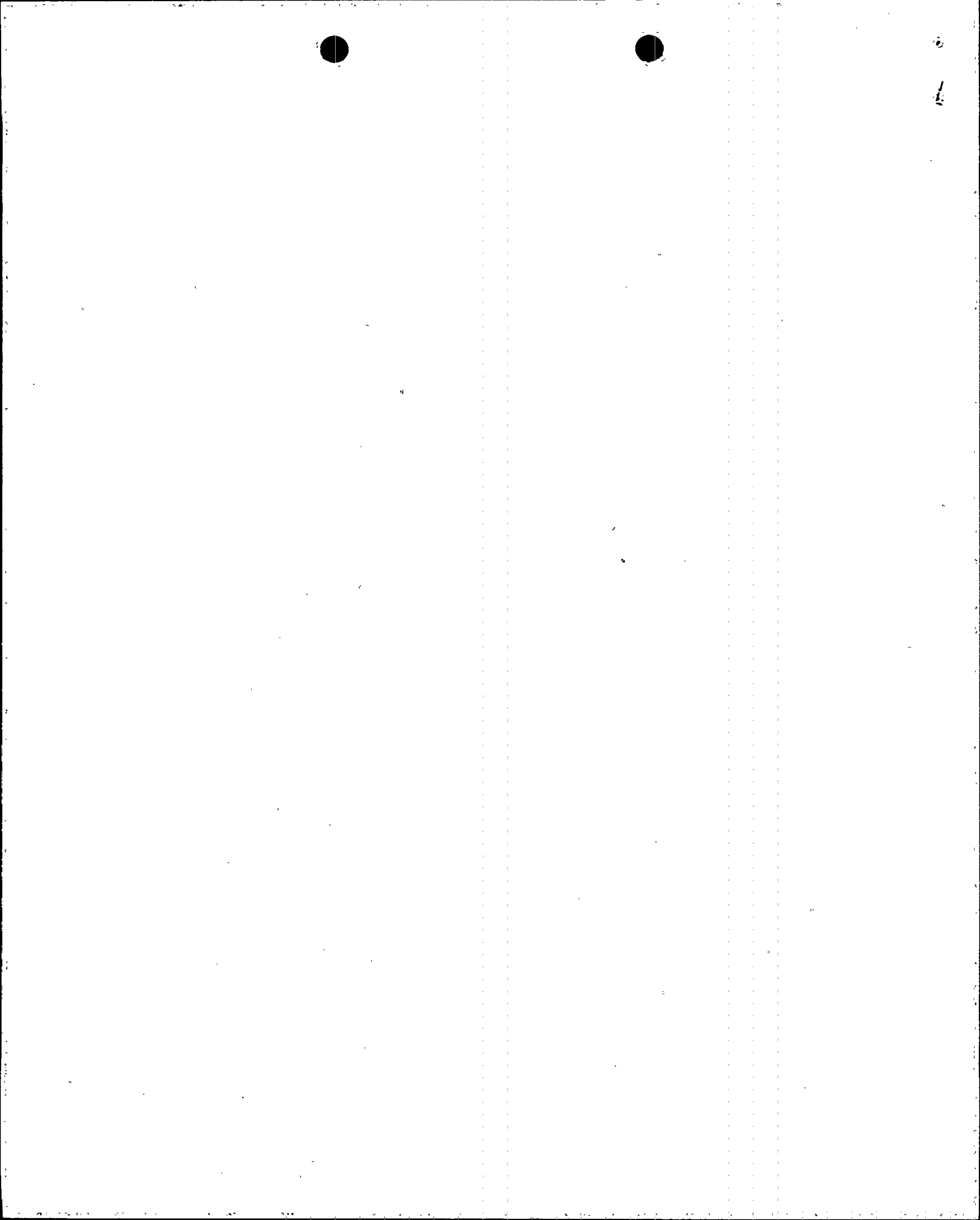
Both surveillances were last performed prior to the unit shutdown prior to hurricane Andrew on August 24, 1992.

## II. EVENT CAUSE

The root cause was a personnel error. Personnel responsible for surveillance tracking attempted to reschedule a surveillance by changing a date on a computer based surveillance tracking system to provide a printout of the above required surveillances to Operations personnel. The date change was made to allow the computer to print out the required surveillances on a "Daily Task Sheet" form or a "Seven Day Look-Ahead Schedule" form. If the date had not been changed the surveillance requirements would have appeared on two forms; 1) Mode Change Report; 2) Surveillance Past Scheduled Date Report. If the surveillances had appeared on either form as incomplete, the surveillances would have been completed prior to the respective mode change. The date change however changed the status of the surveillance in the computer system to current. That is to say, the surveillance tracking system was automatically updated as if the surveillances were complete and therefore, did not need to be done for the next 31 days. The surveillances did appear on the Mode Change Report but were indicated as complete.

## III. EVENT SAFETY ANALYSIS

Prior to the entry into Mode 4, cooling of the reactor coolant system was supplied by the running of a residual heat removal (RHR) pump through a heat exchanger transferring heat to the component cooling water system. The RHR pumps were successfully run. The safety





# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME	DOCKET NUMBER	LER NUMBER	PAGE NO.
TURKEY POINT UNIT 4	05000251	92-006-00	03 of 03

injection pumps were run as part of a Temporary Procedure TP-887, High Head Safety Injection Pump Readiness Test, prior to changing to Mode 4 and the system showed no evidence of needing venting of the piping or the pump casings. The RHR and safety injection systems were walked down to verify valve alignment on September 29, 1992. The ECCS system surveillances were later implemented, as discussed above, and the systems were proven to be operable.

Prior to entry into Mode 3 the standby feedwater pumps were run as part of Temporary Procedure TP-893, Standby Feedwater Readiness Test [Post Andrew]. Both pumps were run on recirculation on September 16, 1992. The system readiness tests did not examine all the parameters that are reviewed during the surveillance test. However, the subsequent surveillance testing performed on the pumps proved them operable. The standby feedwater system is not a safety grade system.

The health and safety of plant personnel and the general public were not compromised as a result of the missed surveillances.

## IV. CORRECTIVE ACTIONS

1. The surveillances were completed within 24 hours of discovery. See the discussion in the Event Description above.
2. All surveillances in the computerized tracking system were independently verified to have been performed, as required by Technical Specifications, to allow a mode change from Mode 4 to Mode 3, Mode 3 to Mode 2, and Mode 2 to Mode 1.
3. The person making the date change was counselled to not make changes to dates in the computer tracking system without written approval for the change from the Operations Support Supervisor. Procedure changes were made to implement this policy.
4. The purpose of the surveillance tracking system was discussed with the planning and scheduling department personnel to emphasize the necessity for care and accuracy.

## V. ADDITIONAL INFORMATION

This event was considered reportable in accordance with 10 CFR 50.73(a) (2) (i) (B).

