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ACCESSION NBR:9403280013 DOC DATE: 94/03/21 NOTARIZED: NO DOCKET #
 FACIL:50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
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 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 94-001-00:on 940223,Analog Channel Operational Test not performed within TS surveillance interval.Caused by scheduling error.Maint procedures modified to display required date of surveillance.W/940321 ltr.

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MAR 21 1994

L-94-066
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 No. 50-251
Reportable Event: 94-001-00
Missed Surveillance on Steam Generator Protection
Channels

The attached Licensee Event Report 251/94-001-00 is being provided
in accordance with 10 CFR 50.73(a)(2)(i).

If there are any questions, please contact us.

Very truly yours,

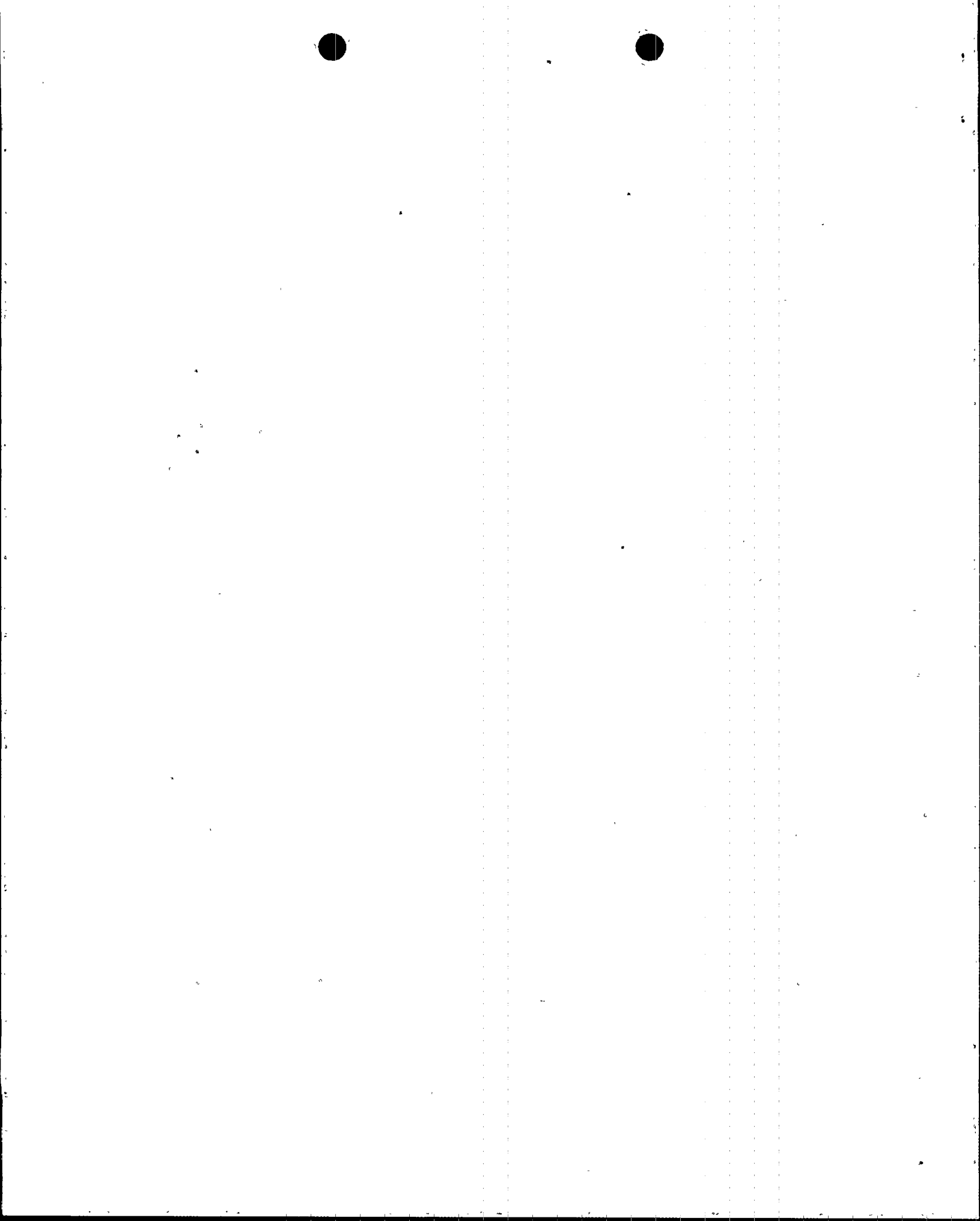
T. F. Plunkett
Vice President
Turkey Point Plant

TFP/JEK/jk

enclosure

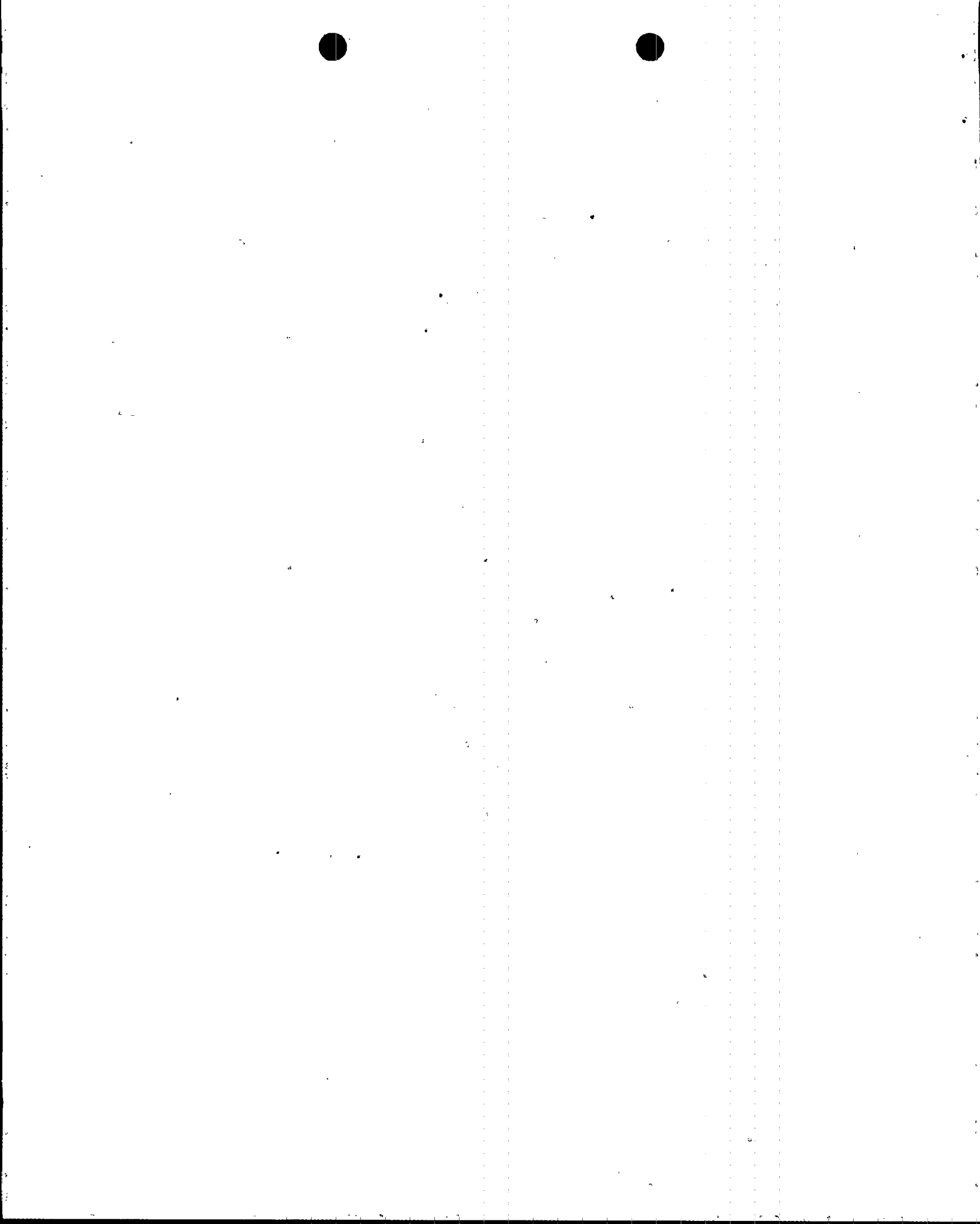
cc: Stewart D. Ebnetter, Regional Administrator, Region II,
USNRC
Thomas P. Johnson, Senior Resident Inspector, USNRC, Turkey
Point Plant

9403280013 940321
PDR ADCK 05000251
S PDR



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="display: flex; justify-content: space-between; width: 100%;"> 1 OF 4 </div>	
TITLE (4) <div style="text-align: center;">MISSED SURVEILLANCE ON STEAM GENERATOR PROTECTION CHANNELS</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	23	94	94	001	00	03	21	94					
OPERATING MODE (9)		1		10 CFR 50.73(a)(2)(i)(B)									
POWER LEVEL (10)		100											
LICENSEE CONTACT FOR THIS LER (12)													
J. E. Knorr, Licensing 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 <input checked="" type="checkbox"/> YES <input type="checkbox"/>								EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR	
(If yes, complete EXPECTED SUBMISSION DATE)													
ABSTRACT (16)													
<p>On February 23, 1994, Florida Power and Light Company personnel discovered that Technical Specification required Analog Channel Operational Tests (ACOTs) had not been performed within the surveillance interval. The set of procedures not completed address ACOTs on three cabinets containing Steam Generator Protection Channels. This procedure set fulfills the requirements of Technical Specifications Table 4.3-1 Item 12 and Table 4.3-2, Items 1.e, 1.f, 4.d, and 6b for Channel III.</p> <p>The last surveillances of these channels were completed on January 14, 1994. The surveillances are required to be completed each 31 days with a maximum allowable extension not to exceed 25% of the 31 days. Therefore, the surveillance was to be completed by February 22, 1994 or 38.75 days later.</p> <p>The surveillances were in progress at the time of discovery and were completed on February 23, 1994.</p> <p>Turkey Point has determined the root cause to be a procedural surveillance scheduling error.</p> <p>Corrective actions made included the modification of Maintenance procedures to display the required due date for a surveillance and the allowed maximum extension allowed by Technical Specifications. Other procedure changes and administrative aids will be implemented to ensure completion of surveillances within required time frames.</p> <p>This missed surveillance is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B).</p>													



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I. DESCRIPTION OF THE EVENT

On February 23, 1994, with Unit 4 at 100% of rated power, Florida Power and Light Company personnel discovered that a Technical Specification required set of Analog Channel Operational Tests (ACOTs) had not been performed within the surveillance interval. The test set is conducted in accordance with procedures 4-SMI-071.1, 4-SMI-071.2 and 4-SMI-071.3. These procedures control ACOTs on Steam Generator Protection Channels (EIIS SYSTEM: JE) in protection racks QR-3, QR-13 and QR-17 (EIIS SYSTEM: JE). These procedures fulfill the requirements of Technical Specifications Table 4.3-1 Items 11 and 12, Table 4.3-2, Items 1.e, 1.f, 4.d, and 6b and Table 4.3-4, Item 21.

Procedure 4-SMI-071.1 for instrument rack QR-3 was complete and 4-SMI-071.2 for instrument rack QR-13 was in progress at the time of discovery of the missed surveillances. All surveillances were complete by 1500 on February 23, 1994.

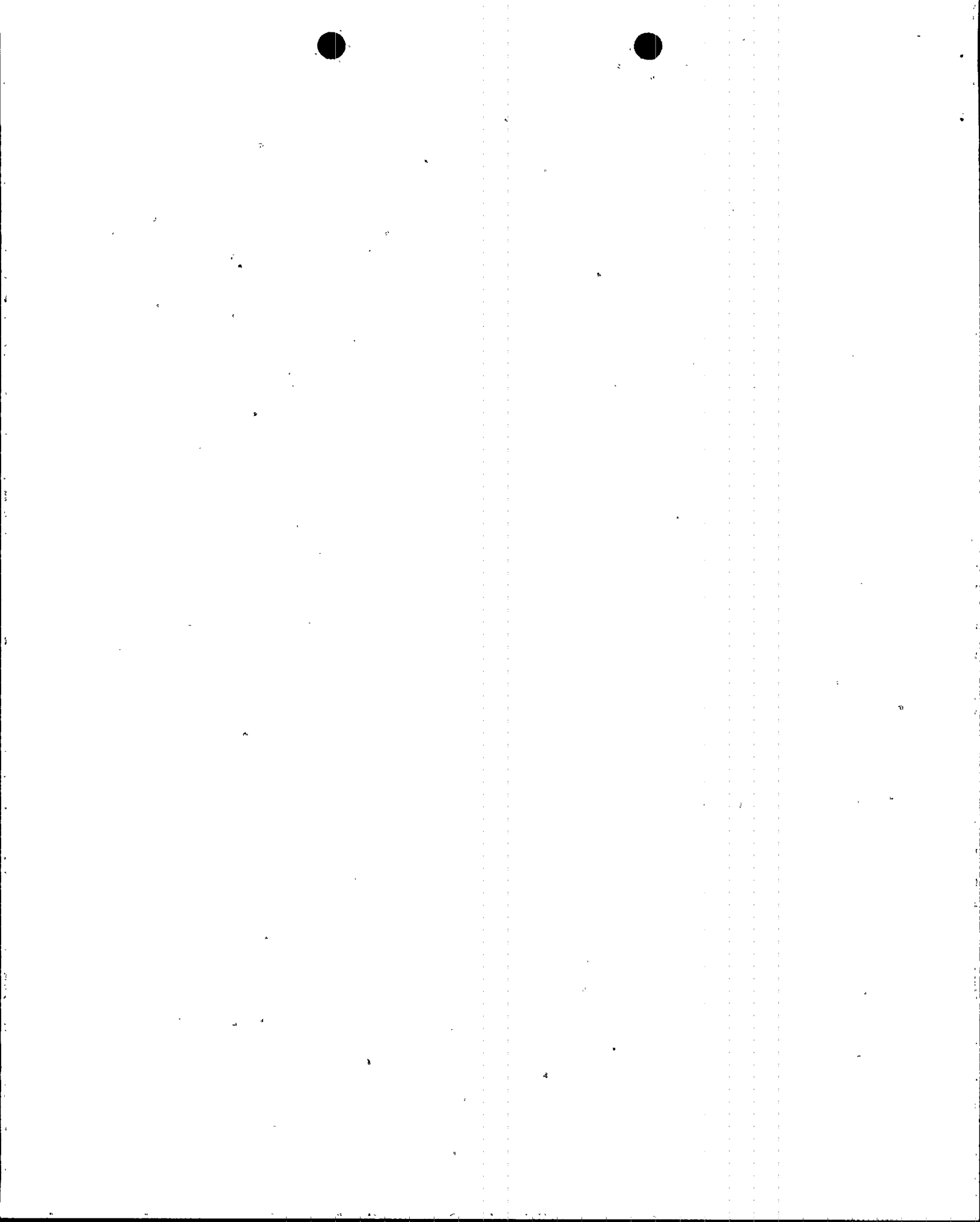
All surveillance tests were completed with no trip channels found out of tolerance.

II. CAUSE OF THE EVENT

Turkey Point has determined the root cause to be a procedural surveillance scheduling error. The scheduling of the surveillance was controlled by a software program under the control of Operations personnel. This program automatically generates surveillance dates based upon the last completed surveillance date. This date is then used by Maintenance Planning personnel to generate Plant Work Orders to actually have personnel perform the work. The Operations software program provides surveillance schedules based upon a regular week of the month and day of the week. Using this method the surveillances for a specific channel almost always occur on a regular basis such as the third Monday of the month. During the scheduling process the program checks to see if the scheduled date falls beyond the allowed extension and if so resets the schedule to require the surveillance within the allowed extension. After a review, no errors were found in this software controlled scheduling process.

The software scheduled date, for this case, fell on the final day of the allowed extension. The Maintenance Planning process did not differentiate between the Technical Specification required date and the allowed extension date and provided a 14 day window during which the surveillance could be performed. This process resulted in a 14 day window which allowed the performance of the Steam Generator Protection surveillances as late as February 28, 1994. Using the above dates the surveillances were scheduled by I&C Scheduling to be completed on February 21, 1994. The work order for the surveillances showed a late date (allowed late date) of February 28, 1994. The surveillances were last performed on January 14, 1994. Therefore, the last date upon which the surveillances could be done within the limits of the Technical Specifications was sometime on February 22, 1994 (31 days plus 25% = 38.75 days). The surveillances were completed on February 23, 1994.

Additional contributing causes included reduced personnel availability because of the February 21 holiday and the process of starting up a unit on the next day. These contributing causes resulted in the surveillances being delayed for two days after the scheduled date.



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III. ANALYSIS OF THE EVENT

Licensing Requirements

Technical Specifications require a Analog Channel Operational Test or Channel Check each 31 days for Reactor Protection and Engineered safety feature channels. The protection channels are tested in accordance with the following procedures:

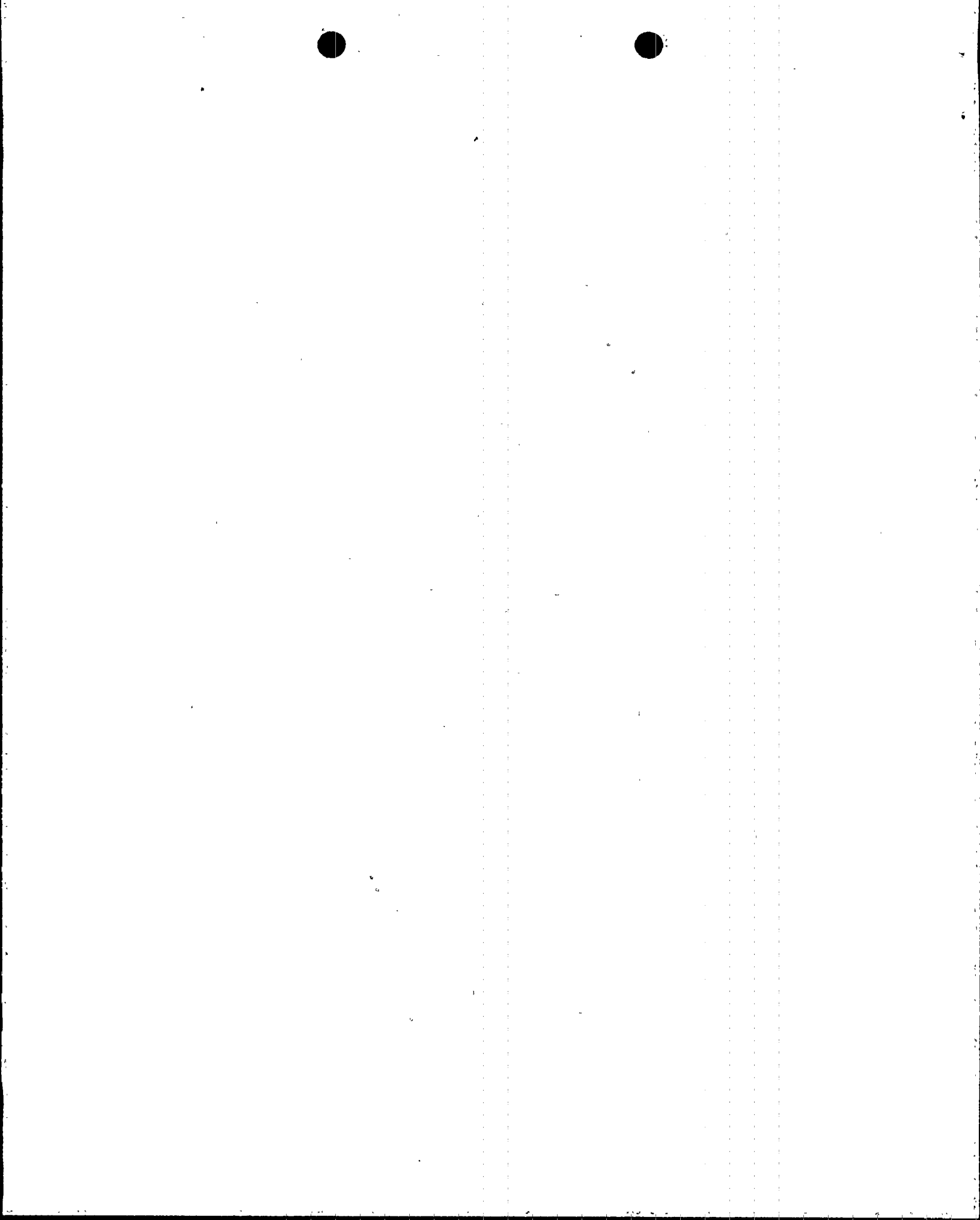
- 4-SMI-071.1, Steam Generator Protection Set I (QR-3) Analog Channel Test;
- 4-SMI-071.2, Steam Generator Protection Set II (QR-13) Analog Channel Test; and
- 4-SMI-071.3, Steam Generator Protection Set III (QR-17) Analog Channel Test.

The following channels are tested by the above surveillances:

- Table 4.3-1,
 - Item 11, Steam Generator Water Level-- Low-Low
 - Item 12, Steam Generator Water Level-- Low Coincident with Steam/Feedwater Flow Mismatch,
- Table 4.3-2,
 - Item 1.e, Safety Injection due to High Differential Pressure Between the Steam Line Header and Any Steam Line,
 - Item 1.f, Safety Injection due to Steam Line Flow--High Coincident with: Steam Generator Pressure--Low,
 - Item 4.d, Steam Line Isolation due to Steam Line Flow--High Coincident with Steam Generator Pressure--Low and
 - Item 6.b, Auxiliary Feedwater Initiation due to Steam Generator Water Level--Low-Low for Channel III.
- Table 4.3-4,
 - Item 21, Steam Generator Water Level (Narrow Range)

Analysis of Effects on Safety

There were no adverse consequences as a result of this condition. At the time of the discovery of the missed surveillance, 4-SMI-071.1 was complete and 4-SMI-071.2 was in progress. 4-SMI-071.3 was completed at 1500 EDT on February 23, 1994. All surveillances of the trip setpoints were found to be within tolerance and were left as found. The total time beyond the TS required was less than 24 hours.



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IV. CORRECTIVE ACTIONS

1. The surveillances which were incomplete at the time of discovery were immediately completed. All trip set points were within the tolerances required.
2. The Maintenance scheduling process has been changed to require plant work orders for surveillances to reflect the only actual due date in accordance with the Technical Specifications.
3. Procedure 0-ADM-215, Plant Surveillance Tracking Program, was revised to clearly describe the responsibilities of Maintenance schedulers to review the printout of the Surveillance Tracking Program with the required dates when scheduling surveillances.
4. Procedure OP-0204.2, Periodic Tests, Checks and Operating Evolutions, was revised to require the Nuclear Plant Supervisor to review the Surveillance Tracking Book for items within 24 hours of reaching the expiration date for the Technical Specification allowed extension for a surveillance.
5. Responsibilities within each affected department responsible for Technical Specification surveillances will be clearly defined and incorporated into appropriate plant procedures.
6. Additional administrative aids have been implemented to provide personnel with the dates past which surveillance schedules must not pass. These administrative aids verified the completion of surveillances scheduled. No other surveillances were past the dates allowed by Technical Specifications.

V. ADDITIONAL INFORMATION

EIIS Codes are shown in the format [EIIS SYSTEM: IEEE component function identifier, second component function identifier (if appropriate)].

LER 251/92-006 discusses a similar surveillance issue with a root cause found to be the control of surveillance scheduling.

