

# PRIORITY 2

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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C      05000250  
 AUTH. NAME:      AUTHOR AFFILIATION  
 MOWREY, C.L.      Florida Power & Light Co.  
 RECIP. NAME:      RECIPIENT AFFILIATION

SUBJECT: LER 94-003-00: on 940720 & 21, until discovered that several required valve stroke time surveillances had not been performed. Caused by personnel error. Personnel reassigned & procedures and surveillance tracking software enhanced.

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# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <b>TURKEY POINT UNIT 3</b>										DOCKET NUMBER (2) <b>05000250</b>		PAGE (3) <b>1 of 5</b>		
TITLE (4) <b>NINE MISSED SURVEILLANCES DUE TO PERSONNEL ERROR; QUARTERLY VALVE STROKE TIMING REQUIRED BY INSERVICE TEST PROGRAM</b>														
EVENT DATE (5)			LER NUMBER (6)			RPT DATE (7)			OTHER FACILITIES INV. (8)					
MON	DAY	YR	YR	SEQ #	RI	MON	DAY	YR	FACILITY NAMES			DOCKET # (5)		
07	20	94	94	003	00	08	16	94	TURKEY POINT UNIT 4			05000251		
OPERATING MODE (9)		1		<u>10 CFR 50.73(a)(2)(1)(B)</u>										
POWER LEVEL (10)		100												
LICENSEE CONTACT FOR THIS LER (12)														
C. L. Mowrey, Licensing OEF Engineer/Analyst										TELEPHONE NUMBER				
										305-246-6204				
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)														
CAUSE	SYSTEM	COMPONENT	MANUFACTURER			NPRDS7	CAUSE	SYSTEM	COMPONENT	MANUFACTURER			NPRDS7	
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 July 20 and 21, 1994, with both units operating at about 100% power, Florida Power &amp; Light Co. discovered that several required valve stroke time surveillances had not been performed. The missed surveillances involved a total of 9 quarterly surveillance procedures, a total of 20 valves, and covered a period of about 16 months from January 1993 to April 1994.</p> <p>The root cause of this event is personnel error in that the IST Coordinator did not ensure that the scheduling was adequate to ensure that the associated valve timing surveillances were performed. He is responsible for ensuring IST program changes are incorporated into plant procedures, for ensuring conformance to plant procedures pertaining to IST testing, and for reviewing the completed surveillances to trend the valve stroke times.</p> <p>All 20 valves have had satisfactory stroke time surveillances performed in the current quarter, so there is no present operability concern. Review of maintenance history showed that none of the valves were inoperable during the quarters in which the surveillances were missed. Therefore the health and safety of the public was not, and is not now, at risk.</p> <p>Corrective actions included review of maintenance and surveillance history for other missed stroke time surveillances, reassignment of personnel, and enhancement of procedures and surveillance tracking software.</p>														

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02 OF 05I. DESCRIPTION OF THE EVENT

On July 20, 1994, with both units at about 100% power, Florida Power & Light Company (FPL) personnel discovered that a quarterly inservice valve exercise (stroke timing) had been missed three times since January 1993. On July 21, 1994, further investigation revealed that a total of nine quarterly surveillances required by Turkey Point's Inservice Testing program (IST) had not been performed. The missed surveillances involved a total of twenty valves, and covered a period of about 16 months from January, 1993 to April 1994.

The details of the missed surveillances are as follows:

PROCEDURE / SECTION	AFFECTED VALVES	MISSED QUARTER(S)
4-OSP-022.4 / 7.3	SV-4-3434 A & B	1/93, 3/93, 1/94
3-OSP-047.1 / 7.4 & 7.5	CV-3-200 A, B, C CV-3-310 A & B	2/93, 1/94
4-OSP-047.1 / 7.4 & 7.5	CV-4-200 A, B, C CV-4-310 B & C	1/94
3-OSP-050.2 / 7.5	MOV-3-860 A & B MOV-3-861 A & B	2/93, 3/93
4-OSP-050.2 / 7.5	MOV-4-860 A & B MOV-4-861 A & B	2/94

Valves SV--4-3434A & B open to provide flow to the Emergency Diesel Generator Fuel Oil Day Tank [DC:tk] from the Diesel Oil Transfer Pump [DC:p] on low Day Tank level.

Valves CV--200A, B, & C isolate the Chemical & Volume Control System letdown line between containment and the letdown orifices [CB:or].

Valves CV--310A & B open to provide flow from the Chemical & Volume Control System charging pumps [CB:p] to the Reactor Coolant System [AB].

Valves MOV--860 A & B and MOV--861 A & B open to allow flow from the containment recirculation sump to the suction of the Residual Heat Removal pumps [BP:p].

The surveillances are required to satisfy Technical Specification 4.0.5, which requires Turkey Point to test pumps and valves in accordance with Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. Section XI requires ASME Code Class 1, 2, and 3 pumps and valves to be tested at least quarterly unless specific relief is granted pursuant to 10 CFR 50.55a(g) (6) (i).

These missed stroke time surveillances are being reported as a condition prohibited by Technical Specification 4.0.5, in accordance with 10 CFR 50.73(a) (2) (i) (B).



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II. CAUSE OF THE EVENTImmediate Cause

The immediate cause of the condition was that the scheduling of stroke time surveillance performances was not adequate to ensure that they were done. Administrative procedure 0-ADM-215 describes the scheduling of plant surveillances by reference to specific surveillance procedures, but some surveillances are listed in 0-ADM-215 by train or component, some are listed by surveillance procedure section, and some surveillance procedures are listed in their entirety. Therefore specific valve stroke times were not listed separately.

The computer software used to implement 0-ADM-215 contained similar inconsistencies, one of which was that the pump surveillances were scheduled, with the expectation that the valve stroke times would be performed in conjunction. As an example, sections 7.1 and 7.2 of 4-OSP-22.4 direct the surveillance on the 4A and 4B Emergency Diesel Oil Transfer pumps, respectively, while section 7.3 directs the performance of the IST stroke timing on valves SV-4-3434 A & B. The Plant Surveillance Tracking Program contained specific scheduling line entries for the surveillances on the 4A and 4B pumps, but contained no specific line entry for the valve stroke times. The result of these inconsistencies was that valve surveillances were occasionally not performed.

Root Cause

The root cause of this event is cognitive personnel error in that the IST Coordinator (other utility personnel) did not ensure that the scheduling of the quarterly surveillances was adequate to ensure that they were performed. The IST Coordinator is responsible for ensuring IST program changes are incorporated into plant procedures, and for ensuring conformance to plant procedures pertaining to IST testing. He is also responsible for reviewing the completed surveillances in order to trend the valve stroke times.

In the past, IST pump surveillances were performed and reviewed by the System Performance Group in the Technical Department; IST valve surveillances were then performed by Operations, at the direction of Technical Department, in order to complete the procedure. About two years ago, the review and performance of the IST pump surveillances was separated. Surveillance performance moved from Technical Department to Operations Department, while final surveillance review to ensure all testing is completed remained with Technical Department.

The methods of ensuring the performance of the IST valve surveillances which sufficed for Technical Department, were not fully implemented for the Operations Department, but the implementation deficiency was not recognized. As a result, the scheduling of the IST valve surveillances was not fully implemented into the 0-ADM-215 processes to ensure a clear understanding of what testing was required when the surveillance test responsibility was transferred to Operations.



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04 OF 05**III. ANALYSIS OF THE EVENT**

Most surveillances demonstrate that systems or components in fact are operable. When a surveillance is missed, it is primarily a question of operability that has not been verified by the performance of the required surveillance. It is overly conservative to assume that systems or components are inoperable when a surveillance has not been performed.

Satisfactory surveillances were completed on all twenty valves during the current quarter, thereby demonstrating the valves' continued operability. The maintenance records for the valves indicated that none of them were out of service during the quarter(s) in which the surveillance(s) was (were) missed. Therefore, despite the failure to measure the stroke time, the operability of the valves was not in question during the quarters indicated in the table above.

Based on the above, the health and safety of the public was not affected.

**IV. CORRECTIVE ACTIONS**

1. The IST Coordinator has been reassigned to another position.
2. The maintenance history for all twenty valves was reviewed. No operability concerns existed during the period of the missed surveillances.
3. Since the process for controlling surveillances changed two years ago, the past two years of IST surveillance history was reviewed. No other instances existed of missed IST surveillances on valves. Since scheduling procedures track pump surveillances specifically no review of pump surveillance history was performed.
4. An independent review of the surveillance scheduling program is being performed by the FPL Quality Assurance Department.
5. The Plant Surveillance Tracking Program (computer software used to implement O-ADM-215) has been revised to include the IST surveillances on the specific valves which were missed. It will be further revised to include line entries for each valve or pump test section, in lieu of identifying the procedure as a whole. This action will be completed by August 31, 1994.
6. For the specific surveillance procedures directing the performance of IST surveillances on pumps and valves, a signoff step has been added to the affected subsections for the pump testing sections, which requires the valve exercising to be performed quarterly.

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V. ADDITIONAL INFORMATION

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

Missed surveillances have been reported previously in LERs 251/92-002, 251/92-006, and 251/94-001. These three are summarized below:

LER 251/92-002 reported a surveillance missed because a commitment to perform the surveillance had not been adequately captured. The commitment to perform stroke timing was made in a relief request submitted several months earlier. LER 251/92-002 involved a surveillance missed on SV-4-3434B, one of the valves on which missed surveillances are reported here, but the earlier event took place before the separation of performance and review functions described in Root Cause above, and was caused by inadequate tracking/implementation of a commitment.

LER 251/92-006 reported a surveillance missed due to an error in the use of the surveillance tracking program. The error caused a surveillance, required to be performed prior to a mode change, to be indicated as complete when in fact it had not yet been performed.

LER 251/94-001 reported several surveillances missed as a result of a difference in the scheduling techniques used by the Operations and Maintenance Departments. The result of the difference was the addition of a second grace period into the scheduling for the subject surveillances.



