



Point Beach Nuclear Plant
6610 Nuclear Rd., Two Rivers, WI 54241

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NPL-97-0128

April 2, 1997

Document Control Desk
US NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Ladies/Gentlemen:

DOCKET 50-266 AND 50-301
LICENSEE EVENT REPORT 97-012-00
DIESEL-DRIVEN FIRE PUMP DAY TANK NOT SAMPLED
IN ACCORDANCE WITH TECHNICAL SPECIFICATIONS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Enclosed is Licensee Event Report 97-012-00 for Point Beach Nuclear Plant, Units 1 and 2. This report is provided in accordance with 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications". This report describes the failure to perform a Technical Specification surveillance for sampling and analyzing the fuel in the diesel-driven fire pump day tank.

If you require additional information, please contact us.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Douglas F. Johnson'.

Douglas F. Johnson
Manager-Regulatory Services
and Licensing

GDA

Enclosure

cc: NRC Resident Inspector
NRC Regional Administrator

9704080391 970402
PDR ADOCK 05000266
S PDR



LICENSEE EVENT REPORT (LER)

(See reverse for required number of
digits and characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH
THIS INFORMATION COLLECTION REQUEST: 50.0 HRS.
REPORTED LESSONS LEARNED ARE INCORPORATED INTO
THE LICENSING PROCESS AND FED BACK TO INDUSTRY.
FORWARD COMMENTS REGARDING BURDEN ESTIMATE
TO THE INFORMATION AND RECORDS MANAGEMENT
BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY
COMMISSION, WASHINGTON, DC 20555-0001, AND TO
THE PAPERWORK REDUCTION PROJECT

FACILITY NAME (1)

Point Beach Nuclear Plant, Unit 1

DOCKET NUMBER (2)

05000266

PAGE (3)

1 OF 4

TITLE (4)

Diesel-Driven Fire Pump Day Tank Not Sampled In Accordance With Technical
Specifications

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
03	04	97	97	012	00	04	02	97	PBNP Unit 2	05000301
									FACILITY NAME	DOCKET NUMBER
										05000
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
			20.2201(b)			20.2203(a)(2)(v)		X	50.73(a)(2)(ii)	50.73(a)(2)(viii)
POWER LEVEL (10)		0	20.2203(a)(1)			20.2203(a)(3)(i)			50.73(a)(2)(iii)	50.73(a)(2)(x)
			20.2203(a)(2)(ii)			20.2203(a)(3)(iii)			50.73(a)(2)(iii)	73.71
			20.2203(a)(2)(iii)			20.2203(a)(4)			50.73(a)(2)(iv)	OTHER
			20.2203(a)(2)(iii)			50.36(c)(1)			50.73(a)(2)(v)	Specify in Abstract below
			20.2203(a)(2)(iv)			50.36(c)(2)			50.73(a)(2)(vii)	or in NRC Form 366A

LICENSEE CONTACT FOR THIS LER (12)

NAME

Glenn Adams, Licensing Engineer

TELEPHONE NUMBER (Include Area Code)

(414) 221-4691

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO
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EXPECTED
SUBMISSION
DATE (15)

MONTH DAY YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On March 4, 1997, with Unit 1 in a hot standby condition (approximately 380°F, 1000 psig) and Unit 2 in a refueling shutdown condition, a licensee engineer discovered that a Technical Specification (TS) surveillance had not been routinely conducted. TS 15.4.15.A.1.d.2 requires a quarterly sample analysis of the diesel fuel for the diesel-driven fire pump (P-35B) engine. The programmatic review found that the TS test procedure (TS-80) for sampling fuel tanks did not include a requirement to sample diesel fuel day tank (T-30) for the diesel-driven fire pump (P-35B) engine. Within 2 hours of discovering this condition, the day tank was sampled and later, shipped for analysis. The appropriate TS action was taken for the missed surveillance. When the analysis results were not received within 24 hours, pump P-35B was declared out-of-service and the appropriate TS action was taken to test the other pump (P-35A). A requirement to sample day tank T-30 on a quarterly frequency is being added to test procedure TS-80.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Point Beach Nuclear Plant, Unit 1	05000266	97	012	00	2 OF 4

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Event Description:

At approximately 1736 CST on March 4, 1997, with Unit 1 in a hot standby condition (approximately 380°F, 1000 psig) and Unit 2 in a refueling shutdown condition, a licensee engineer discovered that a Technical Specification surveillance had not been routinely conducted. This oversight was identified during a programmatic review to ensure that Technical Specifications and other administrative controls have been appropriately implemented. This review was conducted as a Unit 2 refueling outage 22 (U2R22) startup item.

Technical Specification (TS) 15.4.15.A.1.d.2 requires a quarterly sample analysis of the diesel fuel for the diesel-driven fire pump (P-35B) engine. The programmatic review found that Technical Specification Test TS-80, "Sampling of Emergency Fuel Oil Tank (T-72), Fuel Oil Storage Tanks (T-175A,B), and EDG Day Tanks (T-31A,B & T-176A,B) (Quarterly)" did not require sampling of the diesel fuel day tank (T-30) for the diesel-driven fire pump (P-35B) engine. Research indicated that T-30 has never been subject to routine sample analysis.

At the time of discovery, TS 15.4.0.3 was entered. This specification allows up to 24 hours from the time of discovery to conduct a missed surveillance. At approximately 1930 CST on March 4, a sample was drawn from T-30, and packaged for shipping to an independent laboratory. In anticipation that the sample would not be analyzed prior to the expiration of the 24-hour grace period, the motor-driven fire pump (P-35A) was tested at 1403 CST on March 5, 1997 to verify its operability. At 1736 CST on March 5, 1997, P-35B was declared out-of-service because the fuel sample analysis had not been completed within the 24-hour grace period. In accordance with the TS 15.3.14.A.1.b, an operability test of P-35A would be required once every 24 hours until P-35B was restored to service. At 1013 CST on March 6 the laboratory analysis provided satisfactory results. P-35B was returned to service and TS 15.3.14.A.1.b was exited.

The IEEE Standard 803A-1983 component identifiers for this report are:

Tank (TK)
Pump (P)

Component and System Description:

Water for the on-site fire protection system is obtained directly from Lake Michigan through two inlets in the forebay of the circulating water pumphouse. The water is drawn in through two separate traveling screen systems supplying suction to two automatic-starting fire pumps. One fire pump (P-35A) is electric-driven, with emergency power supplied by the plant's emergency diesel generators. The other fire pump (P-35B) is driven by its own diesel engine. A local fuel storage tank (T-30) with a 250-gallon capacity provides for 8 hours of continuous run time.

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

The diesel fire pump day tank (T-30) is filled from the emergency storage tank (T-72); a 14,000-gallon buried tank which is routinely sampled in accordance with TS-80.

Bulk oil is delivered to the site by tank-truck and off-loaded to the bulk oil storage tanks (T-32A,B). Samples are taken from each load and are analyzed for contaminants and combustion properties. Fuel is automatically transferred to the emergency storage tank (T-72) using a level control system. Tank T-72 supplies the gas turbine and the heating boiler, in addition to the fire pump day tank. Prior to recent emergency power system upgrades, tank T-72 also supplied an emergency source of fuel for the emergency diesel generators (G01/G02) fuel oil day tanks.

In accordance with TS Test procedure TS-80, the emergency fuel oil tank (T-72), the fuel oil storage tanks (T-175A,B), and the EDG Day Tanks are sampled on a quarterly basis. The sample is shipped to an independent laboratory in Milwaukee, Wisconsin for analysis. The significant fuel sample parameters are recorded to identify trends. Water content and sediment content parameters have specific acceptance criteria.

Cause:

The Technical Specifications have required P-35B fuel analysis, but did not identify specific sample points. Non-conservative interpretation of Technical Specifications led to the failure to include T-30 in the sampling program.

Although there is no documented evidence to support this point, T-30 sampling may have been omitted based on the belief that the frequent turnover of the tank contents would mean that supply tank sample analyses could be applied to the day tank. The small size of the tank and the rate of usage due to routine engine/pump testing may have supported this conclusion. However, current evaluation of these parameters does not support a conclusion to omit T-30 from the sampling program.

Corrective Actions:

1. As described above, a day tank T-30 sample was drawn and analyzed with satisfactory results.
2. Procedure TS-80 will be revised prior to the next performance of TS-80 to include a quarterly sampling requirement for the diesel fire pump day tank (T-30). This procedure revision will be completed by May 30, 1997.

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TEXT CONTINUATION

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Reportability:

This Licensee Event Report is being submitted in accordance with the requirements of 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications".

Safety Assessment:

Based on the satisfactory sample results received on March 6, the fuel supply to P-35B is adequate. Over plant operating history, satisfactory sample results from the feeder tanks to T-30 provide ample evidence that quality fuel was being supplied to day tank T-30. Also, satisfactory results from routine pump performance tests have shown that the day tank T-30 fuel has been adequate to satisfy P-35B performance requirements. Based on these factors, the fuel in the tank T-30 has been adequate and the associated pump P-35B has been provided an operable fuel source throughout its operating history. Therefore, the health and safety of the public and plant personnel were not impacted by this event.

Similar Occurrences:

Other occurrences of missed TS surveillances include:

<u>LER</u>	<u>Description</u>
266/97-011-00	Containment Fan Coolers Not Tested In Accordance With Technical Specifications
266/97-005-00	1SI-852A Not Tested In Accordance With Technical Specifications
266/97-003-00	Spare Containment Penetrations Not Leak Tested In Accordance With Technical Specifications
266/96-014-00	Steam Generator Blowdown Sample Not Performed In Accordance With Technical Specifications
266/96-012-00	EDG Fuel Oil System Tests Not Performed In Accordance With Technical Specifications