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FACIL:50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
AUTH.NAME AUTHOR AFFILIATION
KORTH,K.J. Florida Power & Light Co.
SAGER,D.A. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 95-003-00:on 950410,TS scheduled surveillance was missed due to procedural deficiency.Performed airlock leak test within 24 h defferal interval of TS 4.0.3.W/950509 ltr.

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FPL

Florida Power & Light Company, P.O. Box 128, Fort Pierce, FL 34954-0128

May 9, 1995

L-95-144
10 CFR 50.73

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Re: St. Lucie Unit 2
Docket No. 50-389
Reportable Event: 95-003
Date of Event: April 10, 1995
Missed Technical Specification Scheduled Surveillance
Due to Procedural Deficiency

The attached Licensee Event Report is being submitted pursuant to the requirements of 10 CFR 50.73 to provide notification of the subject event.

Very truly yours,

D. A. Sager
D. A. Sager
Vice President
St. Lucie Plant

DAS/EJB

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, USNRC Region II
Senior Resident Inspector, USNRC, St. Lucie Plant

9505180324 950509
PDR ADDCK 05000389
S PDR

JEJ

LICENSEE EVENT REPORT (LER)

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

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) St. Lucie Unit 2	DOCKET NUMBER (2) 05000389	PAGE (3) 1 OF 4
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TITLE (4) **Missed Technical Specification Scheduled Surveillance due to Procedural Deficiency**

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
04	10	95	95	--003--	0	05	9	95	N/A	
									N/A	

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
POWER LEVEL (10) 100		<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
		<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> OTHER
		<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	(Specify in Abstract below and in Text, NRC Form 366A)
		<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)

NAME Kelly J. Korth, Shift Technical Advisor	TELEPHONE NUMBER (Include Area Code) (407) 465-3550 x3151
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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).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On April 10, 1995, it was discovered that the Containment Personnel Airlock overall leak rate test was not performed within 6 months of the previous test as required by Technical Specification (TS) 4.6.1.3. The extension of 25% for the surveillance interval described in TS 4.0.2 does not apply for this surveillance. The date of the previous test was September 28, 1994.

The root cause of the event was a procedural deficiency in that the administrative procedure governing the scheduling of Technical Department surveillances contained no mechanism for independent review or documentation of surveillance projected due dates.

Corrective Actions implemented as a result of this event were to: 1) satisfactorily perform the airlock leak test within 24 hour deferral interval of TS 4.0.3, 2) to verify all other Technical Department surveillances were scheduled with the proper periodicity and 3) to revise the Technical Staff surveillance scheduling procedure to ensure required completion dates for surveillances are documented and independently reviewed and 4) the Technical Specification surveillance scheduling procedures for all other departments will be reviewed to ensure documentation and independent reviews of required surveillance completion dates are part of their programs.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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St. Lucie Unit 2	05000389	YEAR 95	SEQUENTIAL NUMBER --003--	REVISION NUMBER 0	2 OF 4

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

DESCRIPTION OF THE EVENT

Certain Technical Specification required surveillances are conducted and scheduled by the utility Technical Department. These surveillances include the containment (EIIIS:NH) personnel airlock overall leak rate test. This test is required to be performed every 6 months without any allowable time extension. Following completion of the surveillance, the cognizant Technical Staff testing supervisor documents when the surveillance will again be due using an informal schedule. The supervisor periodically reviews this schedule for upcoming requirements and schedules the work as the surveillances approach their due date.

The airlock overall leak rate test was performed on September 28, 1994. A testing supervisor mistakenly recorded the projected surveillance due date, using an informal schedule, as April 28, 1995 instead of the actual due date of March 28, 1995. This informal schedule received no independent review or approval. At 1100 on April 10, during a periodic review of upcoming surveillances, the same testing supervisor discovered the error and determined that the surveillance interval had been exceeded. Technical Specification 4.0.3 was entered which permits delaying of the action statement requirements for 24 hours to complete the surveillance. At 1500 the airlock leak test was completed with satisfactory results and Technical Specification 4.0.3 was exited.

CAUSE OF THE EVENT

The root cause of the event was a deficient approved plant procedure that provides instructions for scheduling Technical Department surveillances. The procedure did not require documentation of the surveillance's next required completion date, nor did it require independent review of the schedule for future surveillances.

A personnel error occurred on the part of a Technical Department testing supervisor who miscalculated the date when this periodic surveillance was required to be completed. There were no unusual work characteristics which contributed to this error.

Contributing to the event was the lack of any margin for surveillance deferral built into the schedule. The requirement for conducting the airlock overall leak rate test at a six month interval is contained in Appendix J of 10 CFR 50, Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors. The 25% extension period for surveillance intervals normally allowed under Technical Specification 4.0.2 does not apply to this test.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

ANALYSIS OF THE EVENT

This event is reportable under 10 CFR 50.73 (a)(2)(i)(B) as, "any operation or condition prohibited by the plant's Technical Specifications". NUREG 1022, Event Reporting Guidelines 10 CFR 50.72 and 50.73, states that a missed surveillance is reportable when the surveillance interval plus the allowable interval extension plus the LCO action statement time is exceeded. In this case, the surveillance interval was 6 months with no allowable extension and the action statement time was 30 hours (i.e. restore to operable status in 24 hours or be in hot standby in the following 6 hours). This time period was exceeded by 12 days and therefore meets the reportability criteria.

The bases for the Containment Airlock Technical Specification (TS 3/4.6.1.3) states that the testing is required to meet the restrictions on containment integrity and containment leak rate. The airlock testing was satisfactorily completed, assuring that the airlock's contribution to containment integrity and leakage were acceptable for the entire period between tests.

The health and safety of the public were not affected by this event.

CORRECTIVE ACTIONS

- 1) The airlock overall leak rate test was performed with satisfactory results on April 10, 1995 at 1500 hours.
- 2) The Technical Department testing supervisor involved in this event was counselled on the importance of performing surveillances within the required time interval.
- 3) All other Technical Department surveillances were verified to have been scheduled with the proper periodicity.
- 4) The Technical Department surveillance scheduling procedure was enhanced to include documentation and independent reviews of projected surveillance due dates.
- 5) Surveillances for which the allowable interval extension of TS 4.0.2 does not apply, will procedurally be assigned a required completion date prior to the end of the surveillance interval so as to provide a margin for surveillance deferral.
- 6) All other plant departments' Technical Specification surveillance scheduling programs will be reviewed to ensure documentation and independent reviews of required surveillance completion dates are part of their programs.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

ADDITIONAL INFORMATION

Component Failures

There were no component failures involved in this event.

Previous Similar Events

Similar events that resulted in missed Technical Specification scheduled surveillances are:

LER 335-90-002 "Missed Surveillance on 125 Volt DC Batteries Result in Technical Specification Violation Due to Personnel Error."

LER 389-91-005 "Missed Surveillance for Safety Injection Tank Water Level and Pressure Channel Functional Test Due to Personnel Error."