CATEGORY 1

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ACCESSION NBR:9706250210 DOC.DATE: 97/06/19 NOTARIZED: NO DOCKET #
FACIL:50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
AUTH.NAME AUTHOR AFFILIATION
FREHAFER,K.W. Florida Power & Light Co.
STALL,J.A. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 97-003-00:on 970521,post maint testing was not performed & that caused entry into TS 3.0.3,due to SIT inoperability. Procedure revs to enhance PMT & EOOS process was performed & event was reviewed w/operations personnel.W/970619 ltr.

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TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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CATEGORY 1 DOCUMENT

Florida Power & Light Company, 6501 South Ocean Drive, Jensen Beach, FL 34957

June 19, 1997

L-97-160
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: 97-003
Date of Event: May 21, 1997
Failure to Perform Post Maintenance Testing
Caused Entry Into TS 3.0.3 Due to SIT Inoperability

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,

J. A. Stall
Vice President
St. Lucie Plant

JAS/KWF

Attachment

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

9706250210 970619
PDR ADOCK 05000389
S PDR

250049

IE22

NRC FORM 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 04/30/98
ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY 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 (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

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

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
ST LUCIE UNIT 2	05000389	1 OF 3

TITLE (4)

Failure to Perform Post Maintenance Testing Caused Entry Into TS 3.0.3 Due to SIT Inoperability

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
5	21	97	97	-- 003	-- 0	6	19	97		05000
									FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)					
POWER LEVEL (10)		20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)	50.73(a)(2)(viii)
		20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)	50.73(a)(2)(x)
		20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)	73.71
		20.2203(a)(2)(ii)		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 or in NRC Form 366A
		20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
K. W. FREHAFER, LICENSING ENGINEER	(561) 468-4284

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

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

On 5/21/97, Unit 2 was in Mode 4 and less than 1750 psia. Each Safety Injection Tank (SIT) had a contained water volume of greater than 833 but less than 1250 cubic feet. At approximately 1045, FPL determined that a required post maintenance open stroke test for valve V3245, the 2B2 SIT discharge check valve, had not been performed. The 2B2 SIT was declared inoperable at 1225. Each of the remaining three SITs contained less than 1250 cubic feet of water, therefore the other three SITs could not be considered operable. Technical Specification 3.0.3 was immediately entered. The partial stroke Post Maintenance Test (PMT) for V3245 was successfully completed at 1235, and the 2B2 SIT was declared operable at that time, and Technical Specification 3.0.3 was exited.

The cause of this event was personnel error in that the 2B2 SIT was incorrectly returned to service for Mode 4 operation prior to performing the required testing. Contributing to this error was the fact that each deferred PMT and its associated mode hold was not individually identified in Equipment Out Of Service (EOOS) log.

Long term corrective actions include procedure revisions to enhance the PMT and EOOS process and reviewing this event with cognizant Operations personnel.

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL	REVISION	
ST LUCIE UNIT 2	05000389	97	-- 003 --	0	2 OF 3

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

DESCRIPTION OF THE EVENT

On 5/21/97, Unit 2 was in Mode 4 and less than 1750 psia, with all four Safety Injection Tanks (SITs) [EIIS:BQ:ACC] considered operable. Technical Specification 3.5.1 water inventory requirements for three operable SITs is that each SIT have a contained water volume of between 833 and 1556 ft^3. Each SIT had a contained water volume of greater than 833 but less than 1250 ft^3 and a pressure of approximately 239 psig. At approximately 1045, FPL determined that a required Post Maintenance Test (PMT) for valve V3245, the 2B2 SIT discharge check valve [EIIS:BQ:ACC:V], had not been performed. The 2B2 SIT was declared inoperable at 1225. Technical Specification 3.5.1 water inventory requirements for three operable SITs is that each SIT have a contained water volume of between 1250 and 1556 ft^3. Each of the remaining three SITs contained less than 1250 ft^3 of water, so the other three SITs could not be considered operable. As the Technical Specification has no Action Statement for more than one inoperable SIT with the existing conditions, Technical Specification 3.0.3 was immediately entered. No plant action was immediately required, as the unit was already in Mode 4. The partial stroke PMT for V3245 was successfully completed at 1235, and the 2B2 SIT was declared operable at that time. Technical Specification 3.0.3 was exited as all four SITs were operable with a contained water volume greater between 833 and 1250 cubic feet.

CAUSE OF THE EVENT

Personnel error lead to the 2B2 SIT being incorrectly returned to service prior to performing the required PMT needed to consider the SIT operable for Mode 4 operation. Intrusive maintenance of valve V3245 was completed during the Unit 2 Cycle 10 Refueling outage, thereby requiring PMT in accordance with the St Lucie In-Service Testing (IST) Program. The PMT consisted of an IST valve cycle test and a Seat Leakage test, and these requirements were logged in the Equipment-Out-of-Service (EOOS) Log for the 2B2 SIT.

Plant conditions when the maintenance was completed did not support the conditions required to perform the PMT, therefore the PMTs were deferred. The EOOS log entry for the deferred valve cycle PMT included both the "OPEN" and "CLOSED" tests. Although the required plant conditions necessary to support the PMTs were different, these requirements were not directly specified in the EOOS log entry, but were indirectly specified by referencing the applicable plant test procedure data sheet. The "CLOSED" testing required that the Unit be at normal operating pressure and temperature in Mode 3, and the "OPEN" testing required that the Unit be in Mode 4 with the SIT aligned for normal operation.

The requirements for the valve "OPEN" testing were overlooked when the 2B2 SIT was erroneously restored to service by control room personnel prior to entering Mode 4. Contributing to this error was the fact that each deferred PMT and its associated mode hold was not individually identified in EOOS log.

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL	REVISION	
ST LUCIE UNIT 2	05000389	97	-- 003 --	0	3 OF 3

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

ANALYSIS OF THE EVENT

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B), as any operation prohibited by the plant's Technical Specifications. St. Lucie Unit 2 Technical Specification 3.5.1 states that each Reactor Coolant System safety injection tank shall be OPERABLE in MODES 1, 2, 3*, and 4*. The footnote states:

"*With pressurizer pressure greater than or equal to 1750 psia. When pressurizer pressure is less than 1750 psia, at least three safety injection tanks shall be OPERABLE, each with... a contained water volume of between 1250 and 1556 cubic feet... With all four safety injection tanks OPERABLE, each tank shall have... a contained water volume of between 833 and 1556 cubic feet... In MODE 4 with pressurizer pressure less than 276 psia, the safety injection tanks may be isolated ."

However, the 2B2 SIT was mistakenly considered "Operable" prior to performing the PMT "OPEN" test on the 2B2 SIT check valve. Therefore, all four SITs were erroneously considered available and were only filled to between 833 and 1250 ft^3. When the 2B2 was declared inoperable, the three remaining SIT's did not satisfy the LCO because they not meet the Technical Specification required volume of greater than 1250 ft^3.

Although the SITs were not OPERABLE in accordance with the Technical Specifications, the 2B2 SIT discharge check valve was later determined to be operable via its PMT. Therefore the valve would have been capable of performing its design function (if it had been called upon) during the interval after maintenance and prior to PMT. Consequently, all four SITs were available; therefore there was no adverse affect on the health and safety of the public.

CORRECTIVE ACTIONS

1. The open stroke test of the 2B2 SIT discharge valve was completed satisfactorily on May 21, 1997.

2. FPL will evaluate the EOOS and deferred PMT process and procedures to identify enhancements to ensure that deferred PMTs and applicable modes hold are individually identified in the EOOS process.

3. This event will be reviewed with Operations personnel responsible for assigning, tracking, and determining operability requirements involving PMTs.

ADDITIONAL INFORMATION

None