

CATEGORY 1

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ACCESSION NBR: 9805290081 DOC. DATE: 98/05/21 NOTARIZED: NO
 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.
 AUTH. NAME: AUTHOR AFFILIATION
 FREHAFER, K.W. Florida Power & Light Co.
 STALL, J.A. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

DOCKET #
05000335

SUBJECT: LER 98-006-00: on 980421, missed EDG fuel oil sample surveillance was noted. Caused by personnel error. Revised fuel oil sampling service purchase order & revised site procedure. W/980521 ltr.

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

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Florida Power & Light Company, 6351 S. Ocean Drive, Jensen Beach, FL 34957

May 21, 1998

L-98-131
10 CFR 50.73

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

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335, 50-389
Reportable Event: 98-006
Date of Event: April 21, 1998
Missed EDG Fuel Oil Sample
Surveillance Due to Personnel Error

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

Very truly yours,

J. A. Stall
Vice President
St. Lucie Plant

JAS/EJW/KWF

Attachment

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

9805290081 980521
PDR ADDCK 05000335
S PDR

Y
IL-12



LICENSEE EVENT REPORT (LER)

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

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 (IT-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20565-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

ST LUCIE UNIT 1

DOCKET NUMBER (2)

05000335

PAGE (3)

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TITLE (4)

Missed EDG Fuel Oil Sample Surveillance Due to Personnel Error

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
4	21	98	98	006	0	5	21	98	St. Lucie Unit 2	05000389
									FACILITY NAME	DOCKET NUMBER
									n/a	

OPERATING MODE (9)	POWER LEVEL (10)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)							
1	100	20.2201(b)	20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	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)(ix)			
		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

K. W. Frehafer, Licensing Engineer

TELEPHONE NUMBER (Include Area Code)

(561) 467-7748

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
n/a	n/a	n/a	n/a	n/a					

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).

NO

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

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

On April 21, 1998, St. Lucie Units 1 and 2 were in Mode 1 at 100 percent reactor power. The Nuclear Plant Supervisor invoked Technical Specification 4.0.3, for a missed surveillance on new emergency diesel generator fuel oil delivered on February 17, 1998. The fuel oil sulfur analysis was not performed to the test method specified in the Technical Specifications. A subsequent re-analysis of the February 17, 1998, fuel oil sample was performed to the correct test method and demonstrated that the sulfur content was within the required specification, and Technical Specification 4.0.3 was exited the same day.

This event was caused by a combination of cognitive personnel error on the part of the vendor contracted to perform the sample analysis and procedural inadequacies for site verification of the fuel oil sample results.

Corrective actions included revision of the fuel oil sampling service purchase order and revision of the site procedure used for verification of emergency diesel generator fuel oil properties.

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

DESCRIPTION OF THE EVENT

On April 21, 1998, St. Lucie Units 1 and 2 were in Mode 1 at 100 percent reactor power. At approximately 1130 on April 21, 1998, the Nuclear Plant Supervisor (NPS) received a facsimile copy of a Condition Report (CR) that was generated by the FPL corporate Quality Assurance Department. It described a condition related to the emergency diesel generator (EDG) fuel oil [EHS:DC] sample analyses performed by Herguth Laboratories, Inc. of Vallejo, CA. The issue dealt with a new fuel oil shipment that was sampled on February 17, 1998. The St. Lucie Unit 1 and 2 Technical Specification Surveillance 4.8.1.1.2.c.2 requires verification of specified EDG fuel oil properties "when tested in accordance with ASTM D975-81 except that the analysis for sulfur may be performed in accordance with ASTM D1552-79 or ASTM D2622-82." This verification is required within 31 days of obtaining the new EDG fuel oil sample. Contrary to these requirements, the fuel oil laboratory results received on February 27, 1998, analyzed the sulfur content using an ASTM D4294-90 analysis, a test method not recognized by the Technical Specifications.

The Nuclear Plant Supervisor (NPS) invoked Technical Specification 4.0.3, which specifies actions to be taken upon discovery of a missed surveillance. In this instance, a 24 hour delay in applying action requirements for EDG inoperability was allowed, in order to provide time to complete the surveillance.

Herguth Laboratories was notified of the requirement to re-analyze the February 17, 1998, EDG fuel oil sample sulfur content per ASTM D2622-82. At 1315 on April 21, 1998, Technical Specification 4.0.3 was exited when Herguth notified the NPS that the sample sulfur result, 0.0373% by weight, was within the requirements of table 1 of ASTM D975-81.

CAUSE OF THE EVENT

This event was caused by a combination of cognitive personnel error on the part of the vendor and procedural inadequacies for site verification of the fuel oil sample results.

The purchase order for the St. Lucie fuel oil sampling contract specified the correct Technical Specification ASTM standard to be used for analyzing sulfur content. The vendor erroneously applied the sulfur analysis methodology specified in the price list used by the vendor when developing their quote for services. The price list is contained in the commercial portion (i.e., the portion of the purchase order not subject to 10 CFR, Appendix B, quality assurance requirements) of the purchase order. A joint Nuclear Utilities Procurement Issues Committee (NUPIC) audit finding has been accepted by the vendor, Herguth Laboratories, Inc. of Vallejo, CA., and documents the misapplication of purchase order requirements by the vendor.

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

CAUSE OF THE EVENT (cont'd)

The procedure used to verify the emergency diesel fuel oil sample analysis, C-05, "Diesel Fuel Oil Inventory, Receiving Shipments and Periodic Sampling," was inadequate to assure proper verification of sample results. The procedure did not provide adequate instructions to check each analysis result for the proper test method and did not provide complete references to individual test methods allowed by ASTM D975-81.

Generic implications of this event were investigated by the FPL corporate Quality Assurance Department by examining other vendors that perform Technical Specification required testing. Duke Engineering and Services Environmental Labs, the vendor that provides Technical Specification testing on quarterly gaseous and effluent composite samples, was reviewed and no discrepancies in test methods were noted.

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," due to the missed surveillance of the EDG fuel oil sample.

ASSESSMENT OF SAFETY SIGNIFICANCE

The improper EDG fuel oil sulfur analysis had no adverse impact to the health and safety of the public. The subsequent fuel oil analysis demonstrated that the sulfur content was within the required specification, and EDG operability was not compromised by the missed surveillance. The fuel purchased for the EDGs is low sulfur fuel oil, which typically has a sulfur content of 10 times less than the limit, and the EDG diesel oil storage tanks are tested every 6 months for sulfur content. The effects of an addition of postulated high sulfur content fuel oil would be minimized by the mixing effect with the existing large volume and low sulfur concentration of oil in the EDG diesel oil storage tank and resultant dilution. Additionally, the sulfur analysis was performed with an updated ASTM method for sulfur which would have indicated an adverse sulfur concentration.

CORRECTIVE ACTIONS

1. The existing purchase order, PO 00026828, was revised to correct the erroneous fuel oil sulfur ASTM analysis method referenced in the vendor's quoted price list.

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

CORRECTIVE ACTIONS (cont'd)

2. Procedure C-05, "Diesel Fuel Oil Inventory, Receiving Shipments and Periodic Sampling," will be revised to ensure that:
 1. each analysis is performed per the correct ASTM test method,
 2. each analysis result is within ASTM D975-81 specifications,
 3. instructions are included for notification and CR initiation upon discovery of any Technical Specification parameter found out of specification, and
 4. tracking is included to ensure results are promptly verified to allow any potential corrective action to be performed within the time frame allowed by the Technical Specifications.

ADDITIONAL INFORMATION

Failed Components Identified:

None

Similar Events:

None