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

SUBJECT: LER 90-017-01 on 900817, 0510 & 0912, discovered that fire protection surveillance for 14 dampers missed. Caused by inadequate procedure. Procedure 0-SME-016.4 revised & fire dampers inspected & found to be functional. W/910321 ltr.

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	RGN2 FILE 01		1	1					
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FPL

P.O. Box 029100, Miami, FL, 33102-9100

MAR 21 1991

L-91-075  
10 CFR 50.73

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

Gentlemen:

Re: Turkey Point Unit 3 and Unit 4  
Docket Nos. 50-250 and 50-251  
Reportable Event: 90-017-01  
Date of Event: March 10, 1990  
Missed Fire Protection Surveillance  
Due To Personnel Error

The attached supplement to the Licensee Event Report is being submitted per 10 CFR 50.73 requirements to provide followup information of the subject event.

Very truly yours,

T. F. Plunkett  
Vice President

TFP/DRP/MKA/mka

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

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) **Turkey Point Unit 3** DOCKET NUMBER (2) **0 5 0 0 0 2 5 0 1 0 0 5** PAGE 3

TITLE (4) **Missed Fire Protection 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 NAMES		DOCKET NUMBER(S)
08	17	90	90	017		01	03	219	Turkey Point Unit 4		0 5 0 0 0 2 5 1
											0 5 0 0 0 1 1

OPERATING MODE (9) **1 0 0**

POWER LEVEL (10) **1 0 0**

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. Check one or more of the following: (11)

<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(a)	<input type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 73.71(b)
<input type="checkbox"/> 20.406(a)(1)(i)	<input type="checkbox"/> 50.36(a)(1)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 73.71(c)
<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 50.36(a)(2)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input checked="" type="checkbox"/> OTHER (Specify in Abstract below and in Test Form 368A)
<input type="checkbox"/> 20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<b>Special Report</b>
<input type="checkbox"/> 20.406(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(iv)(B)	
<input type="checkbox"/> 20.406(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(i)	

LICENSEE CONTACT FOR THIS LER (12)

NAME **David R. Powell, Licensing Superintendent** TELEPHONE NUMBER **3 0 5 2 4 6 - 6 5 5 9**

AREA CODE **3 0 5**

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

CAUSE	SYSTEM	COMPONENT	MANUFAC. TYPE	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFAC. TYPE	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)  YES (11 ver complete EXPECTED SUBMISSION DATE)  NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces in approximately fifteen single-space typewritten lines) (16)

On March 10, 1990, with Units 3 & 4 in Mode 1 (Power Operation) at 100 percent power, the 18 month periodicity of Technical Specification (TS) 4.15.5.a.1, including the 25 percent extension permitted by TS 4.0.1, was exceeded for the inspection of 14 dampers covered by 10 CFR 50, Appendix A and Appendix R. Therefore the dampers and their associated fire barriers were technically inoperable from March 10, 1990, until the dampers were inspected using procedure 0-SME-016.4, "Fire Damper Inspection." The missed surveillance of 10 of the dampers was discovered during a Quality Assurance (QA) inspection on August 17, 1990. The other four dampers were discovered on September 12, 1990, during a HVAC review to have also missed the March 10 due date. TS 3.14.5.b.2 requires that a special report be submitted if non-functional fire barriers are not restored to operable status within 7 days. This event was caused by inadequate procedural guidance and cognitive personnel error. Procedure 0-SME-016.4 has been revised to include the 14 Appendix A dampers. The first 10 dampers were inspected and determined to be functional on August 20, 1990. The other four dampers were inspected and determined to be functional on September 14, 1990.

Two additional Appendix R fire dampers were identified which had not been inspected during a review of the HVAC drawings. These dampers were not inspected due to personnel error. The dampers were added to procedure 0-SME-016.4.



LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		90	017	01	02	OF	05

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

I DESCRIPTION OF EVENT

On March 10, 1990, with Units 3 & 4 in mode 1 (power operation) at 100 percent power, the 18 month periodicity of Technical Specification (TS) 4.15.5.a.1, including the 25 percent extension permitted by TS 4.0.1, was exceeded for the inspection of 14 dampers (VI/VF) (BDMP) covered by 10 CFR 50, Appendix A and Appendix R. Therefore the dampers and their associated fire barriers were technically inoperable from March 10, 1990, until the 14 dampers were inspected in accordance with TS 4.15.5.a.1. The missed surveillance on 10 of the dampers was discovered during a Quality Assurance (QA) inspection on August 17, 1990. Four dampers (two sets of two dampers each) were discovered during a review of HVAC drawings on September 12, 1990.

Further review of the HVAC drawings determined that a surveillance was missed on two additional Appendix R dampers. These dampers were last inspected on April 19, 1988. The dampers exceeded the 18 month inspection period, which includes the 25 percent extension permitted by TS 4.0.1, in March 1990. This condition was identified on September 13, 1990.

TS 3.14.5.a requires all fire dampers to be functional. TS 3.14.5.b.2 requires a Special Report if the fire barrier penetrations are not restored to functional status within seven days.

II CAUSE OF EVENT

1. Inadequate Procedure

Procedure 0-SME-016.4, "Fire Damper Inspection," did not cover all 10 CFR 50, Appendix R dampers.

The 14 Appendix A dampers involved in this event were installed and were being inspected in accordance with 10 CFR 50, Appendix A, before 10 CFR 50, Appendix R, was written. When Appendix R was issued, new fire dampers were installed to meet the new requirements. The 14 Appendix A dampers involved in this event met the Appendix R requirements, therefore they were not part of the work package installing the new Appendix R dampers. A new procedure was written to provide the required inspections to the Appendix R dampers. This procedure,



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0-SME-016.4, was written using the design change package that had installed the new Appendix R dampers. Therefore, the previously installed dampers were not included even though they were covered by the new Appendix R requirements.

2. Cognitive Personnel Error (non-licensed contract personnel)

On September 22, 1989, an independent contractor performing an Appendix R audit for FPL notified FPL that 10 Appendix A dampers were not covered by any plant procedures. Procedure 0-SME-016.4 was revised to include the 10 Appendix A dampers in December, 1989. Due to a cognitive personnel error by non-licensed contract personnel, the surveillance was not immediately scheduled and accomplished. The surveillance for the 10 Appendix A dampers identified by the audit was accomplished August 20, 1990, after a Quality Assurance (QA) audit identified that the surveillance had been missed.

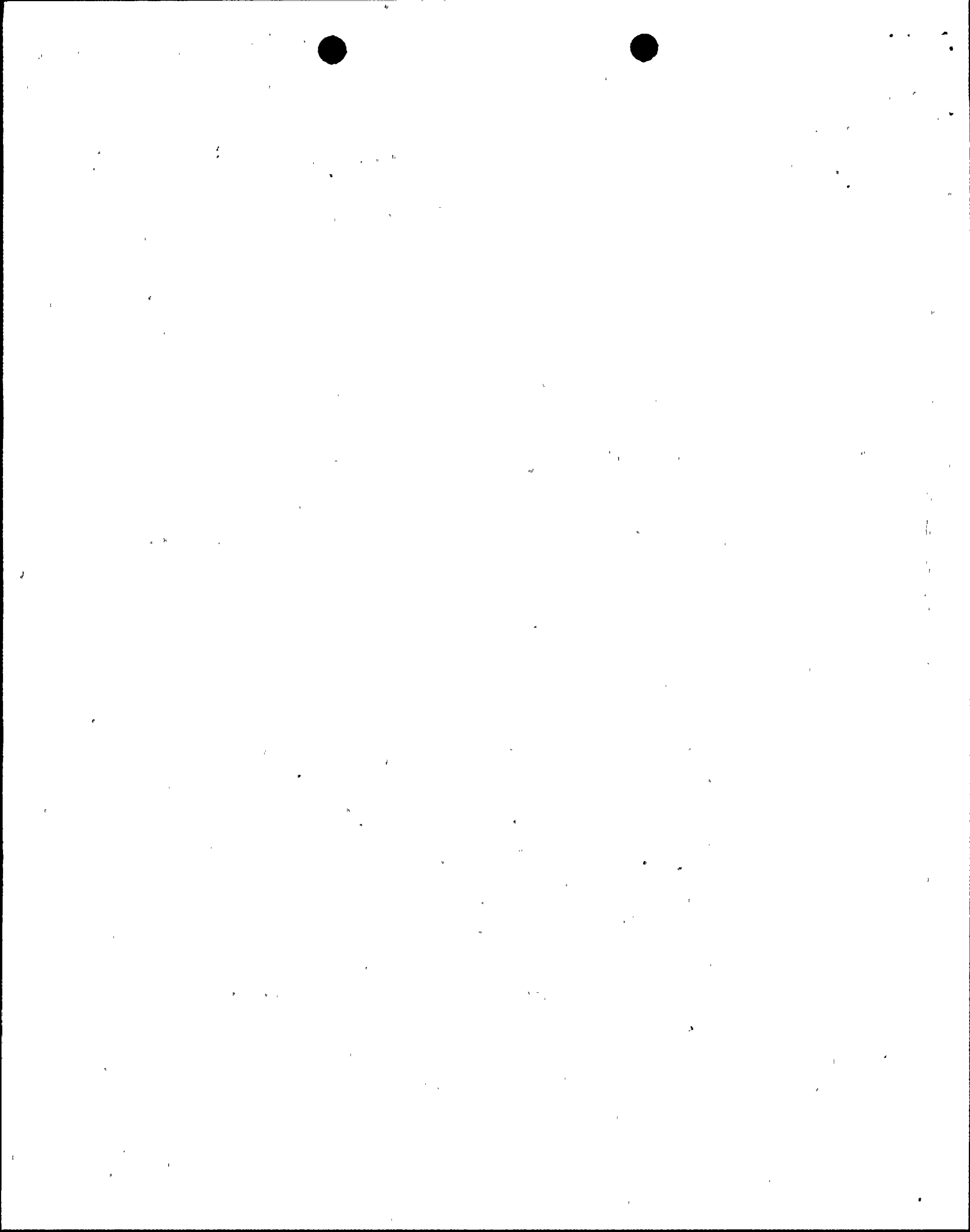
3. Cognitive Personnel Error (non-licensed contract technician)

Procedure covering inspection of the 10 Appendix A dampers was canceled without adequately verifying that the dampers were covered by other procedures

On April 4, 1989, procedure 0-SME-016.3 "Fire Barrier Penetration Seal Inspection," was issued replacing procedure MP-15537.3, "Surveillance of Penetration Fire Barrier." The 10 fire barriers were covered by MP-15537.3. However, since Appendix R dampers were now covered by procedure 0-SME-16.4 and 0-SME-16.3 was to cover penetration seals only, when procedure MP-15537.3 was canceled, on April 4, 1989, the 10 fire dampers were no longer covered by any procedure.

4. The two sets of dampers discovered on September 12, 1990 are classified as quality related. The four dampers are located between the Mechanical Equipment Room and the Control Room. There are physically two dampers in each HVAC Duct. Although they were added to procedure 0-SME-016.4 they are not required to be inspected under Appendix R criteria because the dampers do not separate Fire Areas. Hence, compliance with TS 4.15.5.a.1 was not





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required.

- The cause of the missed surveillance for the last two Appendix R fire dampers identified in the HVAC drawing review was determined to be the same as identified in item 2 above.

III ANALYSIS OF EVENT

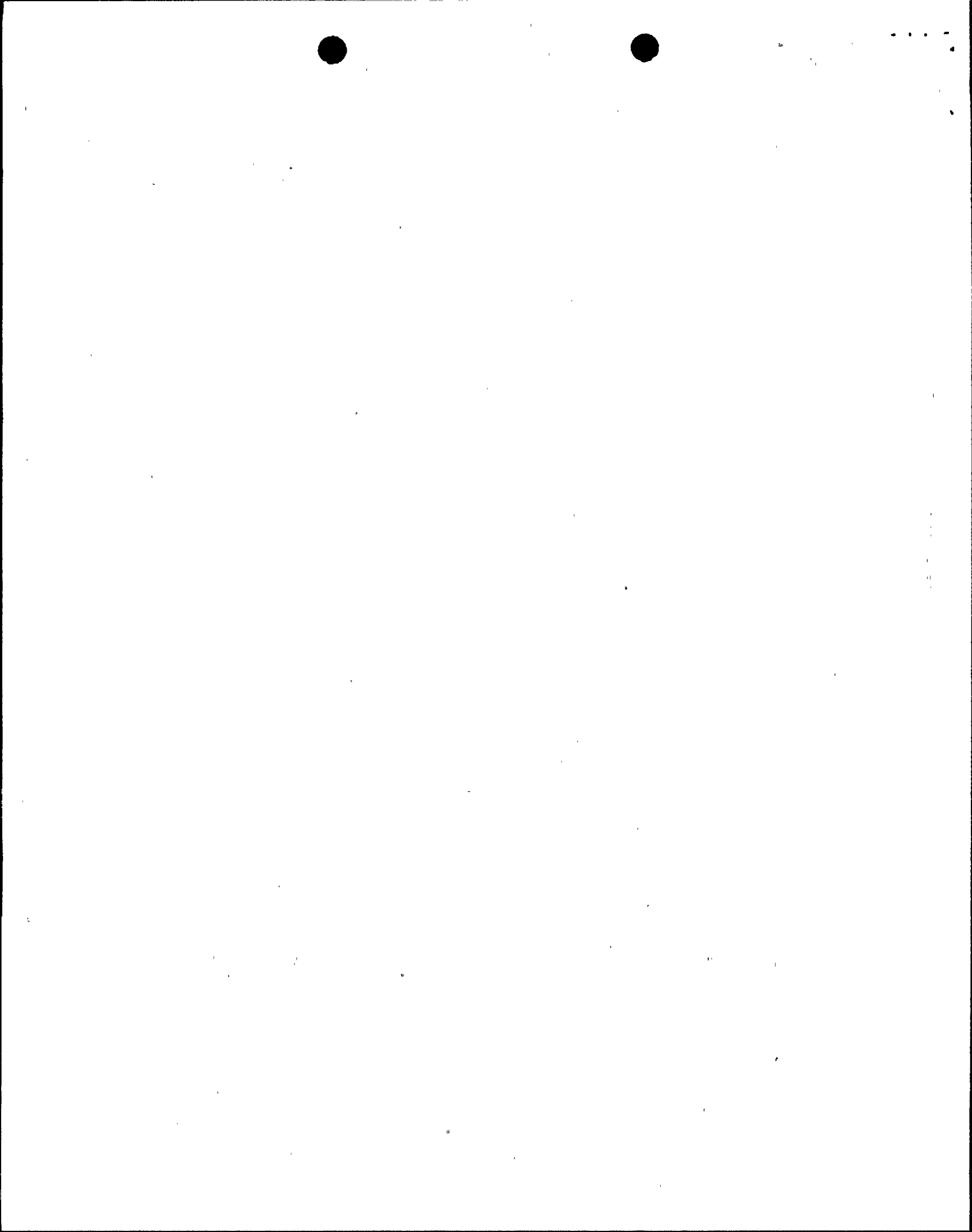
Between April 15 and April 19, 1988, all Appendix R dampers installed were satisfactorily inspected in accordance with the requirements of TS 4.15.5.a.1.

During the time period the fire dampers were technically inoperable, an hourly fire watch patrol previously established from an earlier FPL commitment, was in effect. The surveillance performed on August 20, 1990, found no problems with the 10 fire dampers. The four dampers discovered on September 12, 1990, were satisfactorily inspected on September 14, 1990. These successful inspections provide a reasonable degree of confidence that the 14 dampers were capable of performing their intended function during the time period the dampers were technically inoperable. Thus, the health and safety of the public were not affected by this event.

The last two Appendix R fire dampers identified during the HVAC drawing review are located in the Control Room. On September 14, 1990, a satisfactory inspection was performed on the two dampers. Prior to this inspection, the last inspection performed was on April 19, 1988. One damper is located in the duct work leading to the Control Room rest room and the other resides in the duct leading to the Control Room kitchen. Although the dampers were technically inoperable due to missed surveillances, because the surveillance conducted in September 1990 determined the dampers operable, FPL believes that the dampers would have functioned properly if required had a fire developed in the vicinity of the two fire dampers. Additionally, control room personnel would have intervened if required to put out the postulated fire.

IV CORRECTIVE ACTIONS

- The contract technician responsible for reviewing MP 15537.3 was admonished for not correctly verifying that all dampers included in that procedure were covered in



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other procedures or determined to not be required.

2. On December 19, 1989, procedure 0-SME-016.4 was revised to include the 10 Appendix A fire dampers.
3. On August 20, 1990, the first 10 fire dampers were inspected and found to be functional.
4. Fire Protection has designated a technician to ensure that Fire Protection TS required surveillances are completed as required.
5. The last two Appendix R fire dampers identified by Fire Protection during the review of the HVAC drawings were included in procedure 0-SME-016.4 on September 13, 1990. On September 14, 1990, a satisfactory inspection was performed.
6. Fire Protection's review of the September 1989 Appendix R pre-audit determined that no other omissions were made.
7. The four additional dampers were added to procedure 0-SME-016.4 by use of an on-the-spot-change (OTSC) on September 13, 1990. These four dampers successfully passed the surveillance on September 14, 1990.
8. Because of the number of missed surveillances experienced last year, FPL management went ahead and performed a review of the generic problems associated with surveillance scheduling and tracking to determine applicable corrective actions to reduce the number of missed surveillances. This was completed on January 14, 1991.

Details concerning the corrective actions which came from the review will be discussed in detail in the supplement to LER 250-90-020.

V ADDITIONAL INFORMATION

1. Similar Events: LER 250-90-017, LER 250-90-018, LER 250-90-020, LER 250-90-022
2. Failed Components: None

