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SUBJECT: LER 90-018-00: on 900917, Unit missed fire protection surveillance on switchgear room louver sprays.

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EXTERNAL:	EG&G BRYCE, J.H		3	3	L ST LOBBY WARD		1	1	
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OCT 17 1990

L-90-355  
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: 90-018  
Date of Event: September 17, 1990  
Missed Fire Protection Surveillance On The 4160V Switchgear  
Room Louver Sprays Due To Personnel Error

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

Very truly yours,

*K. N. HARRIS by [Signature]*  
K. N. Harris  
Vice President  
Turkey Point Plant Nuclear

KNH/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) <b>Turkey Point Unit 3</b>	DOCKET NUMBER (2) <b>0 5 0 0 0 2 5 0</b>	PAGE (3) <b>1 OF 0 5</b>
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TITLE (4) **Missed Fire Protection Surveillance on the 4160V Switchgear Room Louver Sprays 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		
0 9	1 7	9 0	9 0	0 1 8	0 0	1 0	1 7	9 0	<b>Turkey Point Unit 4</b>		
									DOCKET NUMBER(S) <b>0 5 0 0 0 2 5 1</b>		

OPERATING MODE (9) **1**

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

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

<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(a)	<input type="checkbox"/> 80.734(e)(2)(iv)	<input type="checkbox"/> 73.71(b)
<input type="checkbox"/> 20.406(a)(1)(i)	<input type="checkbox"/> 80.38(a)(1)	<input type="checkbox"/> 80.734(e)(2)(v)	<input type="checkbox"/> 73.71(a)
<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 80.38(a)(2)	<input type="checkbox"/> 80.734(e)(2)(vi)	<input checked="" type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 366A)
<input type="checkbox"/> 20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 80.734(e)(2)(ii)	<input type="checkbox"/> 80.734(e)(2)(vii)(A)	<b>Special Report</b>
<input type="checkbox"/> 20.406(a)(1)(iv)	<input type="checkbox"/> 80.734(e)(2)(iii)	<input type="checkbox"/> 80.734(e)(2)(vii)(B)	
<input type="checkbox"/> 20.406(a)(1)(v)	<input type="checkbox"/> 80.734(e)(2)(iv)	<input type="checkbox"/> 80.734(e)(2)(viii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
<b>David R. Powell, Licensing Superintendent</b>	<b>3 0 5 2 4 6 - 6 5 5 9</b>

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

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 fifteen single-space typewritten lines) (16)

On September 17, 1990, with Units 3 & 4 in mode 1 (power operation) at 100 percent power, the Quality Assurance Group (QA), released a report indicating that Units 3 and 4, 4160V Switchgear Room louver sprays had not been inspected in accordance with Technical Specification (TS) 4.15.3.a.2. This TS requires a visual inspection of the louver sprays every 18 months. The louver sprays were last inspected on January 18, 1985 in accordance with maintenance procedure (MP) 15537.2, "Fire Protection Equipment - Annual Maintenance." Prior to the 1985 surveillance, the associated louvers had been removed and replaced with 3-hour rated fire barriers. Installation of the barriers rendered the function of the louver sprays obsolete. On March 29, 1985, procedure MP 15537.2 was updated by the Fire Protection Group to delete those steps that required the louver sprays inspection. On August 20, 1985, FPL submitted Proposed License Amendment (PLA)-025 to the NRC requesting that the operability TS for the 4160V Switchgear Room louver sprays be deleted. On March 6, 1987 notification was received from the NRC indicating that no action would be taken on the PLA request to delete the FP TS requirement. However, prior to submitting the PLA to the NRC, surveillance steps for the louver sprays were deleted in procedure MP 15537.2. The louver sprays were inspected and determined operable on September 27, 1990.

The present requirement for inspecting the 4160V Switchgear Room louver sprays is not required in the Revised Technical Specifications which will become effective during the upcoming dual unit outage.

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TEXT (If more space is required, use additional NRC Form 306A's) (17)

I DESCRIPTION OF EVENT

On September 17, 1990, with Units 3 & 4 in mode 1 (power operation) at 100 percent power, the Quality Assurance Group (QA), released a report which contained a finding indicating that Units 3 and 4 4160V Switchgear Room louver sprays had not been inspected, by the Fire Protection (FP) Group, in accordance with Technical Specification (TS) 4.15.3.a.2. After an investigation by the Licensing Group, the finding was determined reportable. TS 4.15.3.a.2 requires the spray and/or sprinkler system be demonstrated operable by a visual inspection every 18 months.. Exceeding TS 4.15.3.a.2 also resulted in noncompliance with associated TS 3.14.3.a which requires the spray and/or sprinkler systems, for Units 3 and 4 4160V Switchgear Rooms, be demonstrated operable whenever equipment in the spray/sprinkler protected area is required to be operable.

The audit by QA found that Units 3 and 4, 4160V Switchgear Room louver sprays were last inspected on January 18, 1985 by maintenance procedure (MP) 15537.2, "Fire Protection Equipment - Annual Maintenance." Prior to performing the last surveillance on the louver sprays the associated louvers had been removed per Plant Change Modification (PC/M) packages 83-141 and 83-142. These PC/Ms removed the Units 3 and 4 louvers and in turn replaced them with 3-hour rated fire barriers. Installation of the barriers rendered the function of the louver sprays obsolete. On March 29, 1985 procedure MP 15537.2 was updated by the Fire Protection Group. The update, deleted the steps that required the 4160V louver sprays inspection. The procedure revision did not receive appropriate plant review or approval by plant management.

With the louver sprays no longer required, FPL on August 20, 1985 submitted Proposed License Amendment (PLA)-025 to the NRC requesting that fire protection TS 3.14.3.a be deleted. The PLA submittal in addition to recommending this change also requested several other fire protection TS changes. This submittal was FPL's response to Generic Letter 83-43. PLA-025 was later approved and issued, as Amendment Nos. 123 and 116. On March 6, 1987, however, the NRC stated that no action would be taken on the portion of the PLA request for deletion of the fire protection TS requirement. No



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

action was taken by the NRC since the Appendix R requirements would be accomplished in accordance with guidance provided in Generic Letter 86-10.

After receipt of Technical Specification Amendment Nos. 123 and 116, the Safety Evaluation Report was not thoroughly reviewed for required actions or changes that needed to be made. Had the review been performed the existing discrepancy with procedure MP 15537.2 could have been found and corrected.

On August 22, 1988, QA in audit report QAO-PTN-88-898 issued a finding to FP. Finding 3 discussed a deviation which existed and still does exist with TS 3.14.3.a and the Final Safety Analysis Report (FSAR). The louver spray surveillance TS did not correlate with Appendix 9.6A of the Final Safety Analysis Report (FSAR). Appendix 9.6A described the plant's current configuration with the fire walls installed. QA's initial reportability review did not specifically identify the finding as being potentially reportable to FP or Licensing. No documented review of this finding was made by Licensing for reportability.

Note that had procedure MP 15537.2 been revised to include the surveillance in 1987 in response to the Amendments, or in 1988 in response to the QA audit finding, a 10CFR50.73 report would still be required because of the missed louver spray surveillance required in late 1986.

This event is reportable under the requirements of 10CFR 50.73(a)(2)(i)(b), as an operation or condition prohibited by the Technical Specifications. In addition, because the louver sprays were not returned to operable status within 14 days as required in TS 3.14.3.b, this event is reportable in accordance with TS 6.9.3.c as a special report. The FP member responsible for initiating the procedure change to MP 15537.2 no longer works at the site.

II CAUSE OF EVENT

The reason for the missed surveillances was attributed to cognitive personnel error. The Fire Protection member who initiated the procedure change to delete surveillance steps in procedure MP 15537.2 did so in violation of existing site procedures. Furthermore, a contributing factor to this event was that the procedure change to MP 15537.2 was carried out without appropriate

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site review and management approval.

III ANALYSIS OF EVENT

Each unit has two 4160V Switchgear Rooms. The purpose of the 4160V Switchgear Room louver sprays during a fire was to actuate and provide a curtain of water protection which would effectively isolated the Switchgear Room louvers from heat and fire. This action would prevent the possible spread of fire into the Switchgear Room and further protect equipment located there from convectional heat damage. PC/M packages 83-141 and 83-142 removed the louvers and in their place installed 3-hour rated fire barriers, thereby negating the need to have louver sprays. At this point, although TS 3.14.3.a and 4.15.3.a.2 required the inspection, the need to inspect the sprays for operability was no longer present. Had a fire developed outside any Switchgear Room, in the vicinity of the associated louver spray, the fire barrier would have prevented the possible spread of fire into the Switchgear Room and prevented any potential heat damage to equipment housed there.

The present requirement for inspecting the 4160V Switchgear Room louver sprays is not required in the Revised Technical Specifications which will become effective during the upcoming dual unit outage.

IV CORRECTIVE ACTIONS

- 1) On the Spot Change (OTSC) # 8459 was written to include Units 3 and 4 4160V Switchgear Room louver sprays in procedure MP 15537.5 "Fire Protection Equipment Surveillance." The louver sprays were inspected and determined operable on September 27, 1990.
- 2) As stated in the second corrective action of LER 250-89-017-00, issued on December 11, 1989, QA is required to directly provide audit reports to the Licensing Group for review. This action requires Licensing to formally document their review to determine the reportability of findings in various reports. Also, a review of QA findings since January 1, 1988 will be conducted to

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9   0	-   0   1   8	-   0   0	0   5	OF	0   5

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determine if other potentially reportable issues exist. This review will be completed by November 30, 1990. In addition, recent changes in the site Licensing Group place the responsibility for TS Amendment processing and review clearly at the site.

V ADDITIONAL INFORMATION

A similar event was described in LER 50-250-90-017-00. This LER addressed a missed surveillance on Appendix A fire dampers.



