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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light Co 05000250
 AUTH.NAME AUTHOR AFFILIATION
 SALAMON, G. Florida Power & Light Co.
 PLUNKETT, T.F. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-004-00: on 920330, QA auditor determined that vendor lab used incorrect ASTM test during 920130 analyses of fuel oil. Procedure 0-NCSP-022.3, "Receiving Fuel Oil Shipments" revised. W/920427 ltr.

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ADD 27 1992

L-92-128
10 CFR 50.73

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

Gentlemen:

Re: Turkey Point Unit 3
Docket No. 50-250
Reportable Event: 92-004
Date of Event: January 30, 1992
Diesel Fuel Oil Analysis Performed
Using Non-Technical Specification ASTM Analysis

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

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

TFP\GS

Attachment

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



LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) TURKEY POINT UNIT 3	DOCKET NUMBER (2) 05000250	PAGE (3) 1 OF 3
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TITLE (4) **Diesel Fuel Oil Analysis for Sulfur Performed in Accordance With ASTM Specification Other Than Required by Technical Specifications Due to Vendor Error**

EVENT DATE (5)			LER NUMBER (6)			RPT DATE (7)			OTHER FACILITIES INV. (8)		
MON	DAY	YR	YR	SEQ #	R#	MON	DAY	YR	NAME		DOCKET # (S)
01	30	92	92	004	0	04	27	92	Turkey Point Unit 4		0500-0251

OPERATING MODE (9)	1	<u>10 CFR 50.73(a)(2)(i)</u>
POWER LEVEL (10)	87%	

LICENSEE CONTACT FOR THIS LER (12)

G. Salamon, Licensing Engineer	TELEPHONE NUMBER
	305-246-6560

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES	(if yes, complete EXPECTED SUBMISSION DATE)				NO		
				X.			

ABSTRACT (16)

On January 23, 1992, two shipments of diesel fuel oil were delivered to Turkey Point. On March 30, 1992, a Quality Assurance Auditor determined that an ASTM specification which was not identified within the Turkey Point Technical Specifications (TS) was used to determine the sulfur content of the fuel oil delivered on January 23. Turkey Point implements the applicable Technical Specification primarily by specifying on the purchase order that the vendor perform the oil analysis in accordance with the TS required ASTM analyses. The vendor believed that any specification permitted by the current edition of the ASTM codes may be used to perform the analysis. Based on this belief, the vendor selected a sulfur analysis method other than the ones called for in the Technical Specifications. The vendor indicated that the selection of the ASTM D4294 method was based on the essential equivalency of the four test methods permitted in the latest edition of the ASTM codes. On April 14, 1992, the sulfur analysis was performed using ASTM D129, and confirmed that the fuel oil met the requirements of the Technical Specifications. Procedure 0-NCSP-022.3 was revised to require that the use of the appropriate TS required ASTM analysis be verified upon receipt of the analysis test results. The Technical Specifications will be reviewed to identify other TS required ASTM analyses which may have been performed to ASTM specifications not permitted by the Technical Specifications. Any operation or condition prohibited by the plant's Technical Specifications is reportable under 10CFR50.73(a)(2)(i).

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME DOCKET NUMBER LER NUMBER PAGE NO.
TURKEY POINT UNIT 3 05000250 92-004-00 02 OF 03

I. EVENT DESCRIPTION

On January 23, 1992, two shipments of diesel fuel oil were delivered to Turkey Point for addition to the Unit 3 Main Tank (EK, EIIS: TK) and the East Light Oil Tank. A vendor laboratory completed analyses of the oil on January 30, 1992. On March 30, 1992, during a scheduled vendor audit, a Quality Assurance Auditor determined that an ASTM specification which was not identified within the Turkey Point Technical Specifications (TS) was being used to determine the sulfur content of the fuel oil delivered on January 23. Units 3 and 4 were operating at 87% and 100% power, respectively, at the time of discovery. On April 14, 1992, following confirmation of the fact that the actual ASTM test being used for testing was not the correct one, the analysis was reperformed using the correct ASTM test. The results indicated that the sulfur content of the fuel oil was within acceptable limits.

During the dual unit outage which was completed in October, 1991, two additional Emergency Diesel Generators (4A and 4B) (EK, EIIS:-DG) were installed. New fuel oil tanks were also installed to be used by the 4A and 4B diesels. The oil used for the initial fill of the Unit 4 tanks was analyzed in accordance with the appropriate ASTM specifications.

Any operation or condition prohibited by the plant's Technical Specifications is reportable under 10CFR50.73(a)(2)(i).

II. EVENT CAUSE

Turkey Point implements the applicable Technical Specification (TS 4.8.1.1.2.e(1)) through the following process:

- o procedure 0-NCSP-022.3 requires the testing of the fuel oil delivered within 30 days of sampling to determine that the sulfur content of the oil is less than .50%.
- o by specifying on the purchase order that the vendor perform the diesel oil analysis 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.
- o following receipt of the test results, verifying that the sulfur concentration is less than .50%.

The vendor laboratory which performed the sulfur analysis believed that any specification permitted by the current edition of the ASTM codes may be used to perform the analysis. Based on this belief, the vendor selected sulfur analysis method D4294, Standard Test Method for Sulfur in Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectroscopy. Technical Specification 4.8.1.1.2.e(1) requires testing using D975-81, except for sulfur, which may also be analyzed in accordance with ASTM D1552-79 or ASTM D2622-82.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME DOCKET NUMBER LER NUMBER PAGE NO.
TURKEY POINT UNIT 3 05000250 92-004-00 03 OF 03

ASTM D975-81 does not permit analysis in accordance with ASTM D4294, however ASTM D975-90, the most recent revision of the D975 specification, does permit the use of ASTM D4294. The vendor indicated that the selection of the ASTM D4294 method was based on the essential equivalency of the four test methods permitted in the latest edition of the ASTM codes. Based on this, the cause of the event was determined to be personnel error by non-utility non-licensed personnel, in that the vendor did not follow the specifications of the purchase order.

III. EVENT SAFETY ANALYSIS

On April 14, 1992, the sulfur analysis was performed using ASTM D129. The analysis confirmed that the fuel oil sulfur concentration was below .50%, and therefore the oil met the requirements of the Technical Specifications. Based on the above, the Emergency Diesel Generators were not placed in an inoperable condition due to improper fuel oil, and the health and safety of the public were not affected.

IV. CORRECTIVE ACTIONS

1. The Unit 3 Main Tank and the East Light Oil Tank were sampled and analyzed for sulfur on April 14, 1992. ASTM D129, as permitted by the Technical Specifications, was used for the analysis. The results indicated a sulfur concentration of .40%.
2. The vendor was requested to perform analyses on fuel oil samples using only the methods listed on the purchase order.
3. Procedure 0-NCSP-022.3, Receiving Fuel Oil Shipments, was revised to require that the use of the appropriate TS required ASTM analysis be verified upon receipt of the analysis test results.
4. The Technical Specifications will be reviewed to identify other TS required ASTM analyses which may have been performed to ASTM specifications not permitted by the Technical Specifications. The review will be completed by May 15, 1992.

V. ADDITIONAL INFORMATION

- A. Similar Events: None
- B. Additional Information: None

