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A4.05
QA

December 17, 1990

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

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Reporting of Licensee Event Report

Gentlemen:

Attached is Licensee Event Report Number LER-90-017-00 for
Waterford Steam Electric Station Unit 3. This Licensee Event
Report is submitted pursuant to 10CFR50.73(a)(2)(i).

Very truly yours,

J.R. McGaha
General Manager - Plant Operations

JRM/DDW/glp
Attachment

cc: Messrs. R.D. Martin
G.L. Florreich
J.T. Wheelock - INPO Records Center
E.L. Blake
D.L. Wigginton
NRC Resident Inspectors Office

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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20545. AND TO THE PAPERWORK REDUCTION PROJECT (3160-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1): **Waterford Steam Electric Station Unit 3** DOCKET NUMBER (2): **0 5 0 0 0 3 8 2 1** PAGE (3): **1 OF 0 3**

TITLE (4): **Missed Diesel Fuel Oil Sample due to not Following the Required Procedure**

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(S)	DOCKET NUMBER(S)
11	16	90	90	017	00	12	17	90	N/A	0 5 0 0 0
									N/A	0 5 0 0 0

OPERATING MODE (9): **1**

POWER LEVEL (10): **100**

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"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
<input type="checkbox"/> 20.405(a)(1)(iii)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(vi)	<input type="checkbox"/> 73.71(c)
<input type="checkbox"/> 20.405(a)(1)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	
<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(k)	

LICENSEE CONTACT FOR THIS LER (12)

NAME: **T.H. Smith, Plant Engineering Superintendent** TELEPHONE NUMBER: **510 4 414 1-1 3 1 2 1 7**

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRCDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRCDS

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 October 18, 1990, diesel fuel oil was added to Emergency Diesel Generator (EDG) "A" Fuel Oil Storage Tank at Waterford Steam Electric Station Unit 3. Contrary to Technical Specification 4.8.1.1.2.c.2, the ASTM-D2274 analysis for insolubles was not performed on the diesel fuel oil sample within 7 days of the addition of the new fuel oil.

Although the sample was drawn and sent to the vendor for analysis, a lack of communication between the vendor and plant personnel resulted in a different analysis from that required being performed. This error was not discovered until November 16, 1990, while reviewing quarterly analyses results of fuel oil samples. This event is reportable as a condition prohibited by Technical Specifications.

The root cause of this event is a failure to follow the required procedure for initiating a contract change. Nuclear Operations Contracting Procedure (NOAP-029) requires a written document, a Contract Action Notice, to initiate a contract change. Verbal communications between plant and vendor personnel discussing the analyses were inadequate and failed to prevent this event. The event did not result in any long term degradation of the Emergency Diesel Generator and did not result in an increased risk to the health and safety of the public or plant personnel.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH IF 301, U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20545 AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2) 0 5 0 0 0 3 8 2 9 0 - 0 1 7 - 0 0	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
					0 2	OF	0 3

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

On October 18, 1990, Diesel Fuel Oil (EIIS Identifier DC) was added to Emergency Diesel Generator (EDG) (EIIS Identifier EK-ENG) "A" fuel oil storage tank (EIIS Identifier DC-TK) at Waterford Steam Electric Station Unit 3. Contrary to Technical Specification (TS) 4.8.1.1.2c.2, the ASTM - D2274 analysis for insolubles was not performed on the diesel fuel oil sample within the 7 day periodicity. This event is reportable as a condition prohibited by Technical Specifications.

Technical Specification change request NPF-38-59 was submitted to the Nuclear Regulatory Commission (NRC) on March 26, 1987. In a correspondence from the NRC dated April 12, 1990, Waterford-3's commitment to investigate the use of a new diesel fuel oil sampling method for particulates, ASTM D-2276, was noted. To support this commitment, a Contract Activity Notice (CAN) was generated on October 8, 1990 to amend an existing contractual agreement with the vendor performing off-site diesel fuel oil analyses. Prior to generating the CAN, plant personnel verbally verified that the vendor was capable of performing the analysis. On October 18, 1990, samples of new fuel oil were drawn in accordance with Technical Specification (TS) 4.8.1.1.2c.2. An additional sample was also drawn and delivered to the vendor with the normal fuel oil samples. The additional sample was drawn to support the investigation of the new diesel fuel oil analysis although this intention may not have been communicated to the vendor. The vendor performed the new analysis, ASTM-D2276, in place of the analysis required by TS 4.8.1.1.2c.2.

The fact that the new analysis had been performed instead of the analysis required by the Technical Specification was not noted during the October 30, 1990 supervisory review. The new test results were similar to the required test results and were within specification. Both analyses test for particulates and use similar units.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

FACILITY NAME (1) Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2) 0 5 0 0 0 3 8 2 9 . - 0 1 7 - 0 0 0 3 OF 0 3	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			

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

On November 16, 1990, during a review of the quarterly diesel fuel oil analyses, the missed analysis was discovered. Later that day, the vendor performed the ASTM-D2274 analysis on the October 18 sample and the results were within the less than 2 mg/100 ml specification for insolubles.

The root cause of this event is a failure to follow procedures. Nuclear Operations Contracting Procedure (NOAP-027) requires that modification of an issued Contract Order be initiated by a Contract Activity Notice (CAN). Instead of notifying the vendor with the specified written requirements of the CAN, the contract modification was verbally communicated to the vendor. The resulting confusion caused the vendor to substitute the similar new analysis for the required analysis, instead of performing the new analysis as an additional analysis. The CAN has been approved and issued to the vendor and Chemistry department personnel will be given training regarding NOAP-027.

Although the time requirement of the required analysis was not met, the event did not result in any long term degradation of the Emergency Diesel Generator (EDG) (EIS Identifier EK-ENG) and did not result in an increased risk to the health and safety of the public or plant personnel.

SIMILAR EVENTS

LER 88-020 reported that diesel fuel oil was not analyzed by the specified procedure due to personnel error. Procedures in "Standard Specification for Diesel Fuel Oils", ASTM-D975-1977 for two analyses were not being followed by the vendor's lab.

Emergency Diesel Generator fuel oil tanks that were not being sampled by the methodology specified in Technical Specifications (ASTM-D270) was reported in LER 89-008.

PLANT CONTACT

T.H. Smith, Plant Engineering Superintendent, 504/464-3127