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The root cause of the missed fire hose inspection was that the surveillance schedule and implementing were not revised when surveillance interval changes were made. The root cause of the failure to hydro test the fire hoses was failure of the Surveillance Coordinator to follow Administrative Procedure 1001. Specification Surveillance Testing Program, by not carrying the missed hose tests as surveillance "on	inspection ed by CAP ispect the been was written t flowing day, ound to have had not bee were declare and found g document ostatically J, "Technical en items"	e hose umente ce to ins ad not b -0783 v The fol was for ose. es that l iency w ested an menting o hydro 1001J	a fire docu illance ed had 1998-0 as. T hich w ed hoses deficie ere tes nplem ure to dure	to perform illance was edial survei oses involve 298 CAP T1 affected are xth hose wh new certifie ditional fire ted by this o d hoses we dule and im e of the failu ative Proce	e failure d surve he rem of the ho r 16, 19 to the a The si l with a five add s affect e lapse ce sche ot cause	es) (1 ed th misse ce of it six temb outed ctory olace ery of e hos intil th reillar he ro ow A	n," identificy. The erforman found that . On Sep es were r be satisfa n was re de discov . The fin d areas n the sum made. The the sum	e-spaced to Protectic th freque ring the frequence ional hose found to legradation cument th interva he affect	2, "Fire 18 moni 998. Du echniciar i month ind addit ited and parent of 36 moni uted to to aspection val chan veillance	TMI-98-1 required per 16, 1 , 1998, te quired 36 ic tests a tically tes other ap was issu required a were ro re hose in nce inter f the Sur	Audit S- edurally Septeml mber 16 t their re hydrostat s and no 98-1023 ithin the al hoses hissed fil surveilla failure o	400 sp rance e proc en on Septe sted a ssed h were rasion P T19 sted w ddition	Assurate of Assurate of Assurate of Assurate of Assurate of Surate of Assurate of Assurate	24/9 static rable pot ca not re ficatio	BSTRA The G survei T1998 hose is hydroid docum five of minor On 11 hydrois inoper satisfa The ro were it test th Specifi	

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I. PLANT OPERATING CONDITIONS BEFORE THE EVENT

The plant was operating at 100% power at the time the conditions were determined to be reportable and was not changed as a result of that determination.

II. STATUS OF STRUCTURES, COMPONENTS OR SYSTEMS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT.

No systems, structures or components were out-of-service that contributed to the condition addressed by this LER.

III. EVENT DESCRIPTION

The Quality Assurance Audit S-TMI-98-12, "Fire Protection," identified the failure to perform a fire hose [KP/] inspection surveillance at the procedurally required frequency. The inspection is required by Administrative Procedure (AP) 1038, "Fire Protection Program," Exhibit 7 "Safety Related Test and Inspection" to be performed every 18 months. The inspection had not been performed since February 19, 1996; approximately 31 months ago. The missed surveillance was documented by CAP T1998-0779 which was written on September 16, 1998.

During the performance of the remedial surveillance to inspect the hose stations on September 16, 1998, technicians further found that the six hoses involved had not been hydrostatically tested at the AP 1038 required frequency of 36 months. These six hoses were not hydrostatically tested when this surveillance was performed on February 19, 1996, because modifications were in progress to the space in which they were permanently installed. The last previous complete performance of this 36 month hydrostatic test was May 17, 1994 approximately 52 months ago. CAP T1998-0783 documenting the missed hydrostatic tests was written on September 16, 1998.

The fire protection program requires that fire hose station inspection and hose hydrostatic test surveillances be performed every 18 and 36 months respectively. However, both surveillances were historically performed as a combined activity every 18 months via Surveillance Procedure (SP) 1301-12.3, "Fire System Hose Station Inspection and Functional Test". In 1991, a separate task was set up in the computerized work management system, Generation Maintenance System 2 (GMS2), to perform the hose station inspection as a separate activity on an 18 month frequency from the hydrostatic hose test at the 36 month frequency. Because the task was never activated, the hose station inspection and hydrostatic test continued to be performed as a single combined activity at an 18 month frequency. In 1994, the interval for performance of the hydrostatic testing was changed in GMS2 to correspond with the AP 1038 frequency of once every 36 months. The failure to activate the GMS2 18 month fire hose inspection task went unrecognized and consequently no changes were made to SP 1301-12.3, to separate the inspection task from the hydrostatic test. Since it was not scheduled as a separate 18 month activity, the hose inspection was not performed in 1997 as it should have been.

It was subsequently discovered on September 16, 1998 that they had not been hydrostatically tested in February 1996, when the fire hose inspection and hydrostatic test was being performed on other hoses covered by SP 1301-12.3. At that time, the hose stations connected to FS-V-392 and FS-V-393 [KP/SHV] were removed from the Fire Service system to support a modification to facilities in the Control Tower. A Surveillance Deficiency Report, generated in accordance with Administrative Procedure 1001J, "Technical Specification Surveillance Testing Program", identified a memorandum by the Fire Service Program Engineer as the vehicle to cause the hoses to be inspected and hydrostatically tested when modifications

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

were complete. Contrary to the expectations of AP 1001J, the surveillance coordinator mistakenly closed the surveillance deficiency based on the memo from the program engineer and signed off in GMS2 as a combined hydrostatic test and inspection, even though surveillance data sheet included a note identifying that only an inspection of the hose stations had been performed. Consequently the missed hydrostatic tests were not carried as an "open item" in the Surveillance Open Items List and were never rescheduled in GMS2.

On November 24, 1998 prior to completion and independent of a committed action to perform the program review, the FPE identified five additional hoses that exceeded the 36 month hydrostatic test performance frequency. The FPE initiated a review of the hard copy data package for the last performance of SP1301-12.3 "Fire Hose Station Inspection and Functional Test", dated February 29, 1996. He found a conflict between the surveillance procedure data sheet documentation which did not document completion of any hydro tests and field indication that some hoses were tested in February 1996. Discussions with individuals involved with the February 1996 test revealed that after performing some of the hose surveillance tests, they were told by the prior FPE that the next scheduled hydrostatic testing was due in May 1997; three years from the last performed test in May 1994.

Although the tested hoses were marked to show testing in February 1996, only completion of the hose station inspections was documented by a note in the "Additional Comments" section of the cover page (Technical Specification Surveillance [TSS] Job Order) of the February 1996 test package. The reason why the tests were not completed as required in 1997, was that the TSS Coordinator failed to assimilate the note (that only the inspection activity was performed) and mistakenly signed off the GMS2 surveillance as "complete" for both the inspection and hydrostatic test in February 1996. This error caused him to fail to reschedule the hydrostatic tests for May 1997. The TSS coordinator could not account for these errors. CAP T1998-1023 was written on November 24,1998 to document the missed hose test surveillance for the hoses at stations FS-V-117, FS-V-148, FS-V-149, FS-V-151, and FS-V-386 [KP/SHV].

IV. AUTOMATIC OR MANUAL INITIATED SAFETY SYSTEM RESPONSES

No automatic or manual safety system responses were involved with the deficiencies reported herein since there was no physical plant event.

V. FAILURES AND ERRORS

The root cause determination found that the 18-month fire hose inspection surveillance was missed due to the failure to ensure that all appropriate changes were made to the surveillance schedule and implementing documents when associated surveillance interval changes were made. Contributing to this event was the omission of the inspection frequency in Surveillance Procedure 1301-12.3, "Fire System Hose Station Inspection and Functional Test." Although SP 1301-12.3 was historically performed every 18 months, throughout this time, the only reference to frequency identified in this procedure is "3 years" found in the header of the hydrostatic test data collection page.

The root cause of the missed hydrostatic tests for the initial six fire hoses was the failure to follow administrative procedures; specifically Administrative Procedure 1001J, "Technical Specification Surveillance Testing Program," by not carrying the missed hose tests as surveillance "open items" and documenting the tests not performed as complete in GMS2.

The "extent of condition" was not fully known since the review did not compare AP 1038 to the lower tier implementing documents. Therefore, a long-term corrective action was initiated to verify that the

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requirements of the fire protection program are being fully implemented at the required intervals through GMS2, the respective fire protection inspection and surveillance test activities and to identify any other instances of a missed fire program surveillance activity or improperly scheduled tasks. The effort necessary to effectively complete this action was specified to include a comprehensive review of the program from the top down, through the implementing procedures, the GMS2 task scheduling and a check of the last performed surveillance documents to confirm they were each successfully completed at the correct interval. This comprehensive program review to identify the "extent of condition" would have identified the additional missed hose tests, prior to its January 1, 1999 completion date.

The missed hydrostatic hose test surveillance activities were a result of the same data entry error for the surveillance performed in 1996.

VI. ASSESSMENT OF THE SAFETY CONCEQUENCES AND IMPLICATIONS OF THE EVENT

There were no safety consequences associated with either the missed hose inspection or hydrostatic tests identified. No fires, requiring use of these hoses, occurred between the expiration and re-establishment of their functionality. Hose functionality was re-established based on satisfactory hydrostatic test completion. These missed surveillances, inspections and hydrostatic tests, did not result in any actual or potential adverse impacts on personnel or plant equipment.

VII. PREVIOUS EVENTS OF A SIMILAR NATURE

Plant records; Licensee Event Reports, Corrective Action Program Documents, Plant Review Group minutes, and Quality Deficiency Reports, of the past five years were researched to identify events related to "missed" technical specification equivalent surveillances, i.e. not performed within the scheduled time frame. The search results are listed below in chronological order.

- PRG Meeting 94-031 of 06/07/95 Some Calibration checks on containment monitoring instrumentation were not scheduled due to a previously incorrect interpretation of Technical Specification requirements.
- PRG Meeting 94-067 of 08/05/94 Calibration checks on RM-A5 and RM-A15 were not scheduled due to a previously incorrect interpretation of Technical Specification requirements.
- LER 93-005 05/10/93 The Reactor Building Annual Inspection was not performed as a result of Engineering Department not effectively tracking and communicating the need to perform the surveillance.
- CAP T1997-0845 11/06/97 Saturation Margin Monitor Surveillance missed due to a failure to reschedule this surveillance after another surveillance, which satisfied these surveillance requirements, had been performed on an earlier date.
- LER 98-002 documented a missed Spent Fuel Pool sample surveillance which resulted from a lack of familiarity with requirements and loss of a posted work instruction placard.
- LER 98-008 documented a failure to identify an out of tolerance reading due to less than adequate I&C work verification practices during performance of a Technical Specification calibration surveillance.

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VIII.	IMMEDIATE AND CORRECTIVE ACTIONS								
Tł	he following immediate actions were completed	for the September	16, 1998	event:					
	Immediate estimate provide the science theory								
1.	perform the activity. The inspections were com	spection surveillan ipleted satisfactoril	ce was t y on Sep	o initiate a . tember 16,	Job Orde 1998.	r to			
2	The six fire bases were declared incoareble on	duvithin 4 hours of t	ha idaati	Casting of th					
2.	tests and additional hoses were routed to the aff	d within 1 hour of t	he identi	fication of the	he misse	d hydro	static		
	was replaced with a new certified hose becaus	e of minor cracking	of the is	acket) was (complete	d Sente	mber		
	17, 1998 and the system was restored to fully op	perable status. Note	: this ho	se was rem	oved fror	n service	e and		
	the fittings were cut off before it could be teste	d. The hose showe	ed minor	age related	I cracking	g of the	outer		
	rubber jacket. Hoses with this type of degradat	tion historically pas	sed their	hydrostatic	tests.				
3.	Management reviewed the expectations of AP-	1001J to individual	s respon	sible for tra	ckina su	veillanc	e		
	open items that items be tracked to their compl	etion and that infor	mal proc	cesses shou	uld not be	e relied	~		
	upon to see that work associated with open iter	ms is completed.	This actio	on was com	pleted or	٦			
	September 16, 1998.								
C	ompleted corrective actions associated with the	Sentember 16 190	8 event						
		oopteniber ro, rot	o event.						
1.	Revision 17, effective December 31, 1998, to S	Surveillance Proced	lure 130	1-12. 3 "Fire	System	Hose			
	Station Inspection and Functional Test" include	d verbiage explaini	ing that t	he procedu	re impler	nents a			
	the surveillance intervals and reformat the proc	id a separate requi	rement t	o inspect th	ose hose	es, spec	ity		
	and bartomarios intervals and reformat the proc	edure to make the	Se lacis	ciear and er	inpitatic.				
2.	Based on the indications of weaknesses found during the programmatic review, the surveillance program								
	management reviewed the recent events and n	ninor deficiencies v	vith the s	surveillance	group. I	essons			
	the requirements of procedure 1001 h addressing incomplete eventility of the requirements								
	comments.	ssing incomplete s	urvellan	ce items an	ia surveii	lance			
	- scheduling, schedule revisions, and records	storage expectatio	ns,						
	- relevant procedure revisions and other impre	ovements being co	nducted	such as the	surveilla	ance			
	matrix.	000							
	This action was completed on December 23, 1	998.							
TI	he following immediate actions were completed	for the November 2	4, 1998	event:					
	The Contraction of the Alignetic Alignet								
1.	tests additional bases were routed to the affect	d within 1 hour of th	e identifi	cation of the	e missed	hydrosta	atic		
	tests, additional noses were routed to the allec	ieu aleas.							
2.	All TS hoses not tested in September 1998 were	e hydrostatically tes	ted as pa	art of correc	tive actio	n for T-	1998-		
	0783. This testing is now complete and there w	were no test failure	S.						
3	Physical walkdown inspections were performed	on all Technical S	necificat	ion and No.	Techo	ical			
0.	Specification fire hoses in the plant to verify that	at the hydrostatic te	st date of	on the hose	was con	sistent			
	with test completion records in GMS2. The five	e hoses identified o	n 11/24/	98 in additio	on to the	six hose	es		
	previously identified in CAP T1998-0783 were a	confirmed to be the	only fire	hoses at th	ne station	h that			
	exceeded their hydrostatic test interval requirer	nents.							

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* The Energy Industry Identification System (EIIS), System Identification (SI) and Component Function Identification (CFI) Codes are included in brackets, "[SI/CFI] where applicable, as required by 10 CFR 50.73 (b)(2)(ii)(F).