

#### UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II SAM NUNN ATLANTA FEDERAL CENTER 61 FORSYTH STREET SW SUITE 23T85 ATLANTA, GEORGIA 30303-8931

October 28, 2002

Florida Power & Light Company ATTN: Mr. J. A. Stall Senior Vice President of Nuclear Operations PO Box 14000 Juno Beach, FL 33408-0420

SUBJECT: TURKEY POINT NUCLEAR PLANT - NRC INTEGRATED INSPECTION REPORT 50-250/02-03, 50-251/02-03

Dear Mr. Stall:

On September 28, 2002, the NRC completed an inspection at your Turkey Point Units 3 and 4. The enclosed report documents the inspection findings which were discussed on October 3, 2002, with Mr. T. Jones and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

This report documents one NRC identified finding of very low safety significance (Green). This issue was determined to involve a violation of NRC requirements. However, because of the very low safety significance and because it has been entered into your corrective action program, the NRC is treating this issue as a Non-cited violation in accordance with Section VI.A of the NRC's Enforcement Policy. Additionally, one licensee identified violation is listed in Section 40A7 of this report. If you contest either of these Non-cited violations, you should provide a response, within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001; with copies to the Regional Administrator, Region II; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Turkey Point facility.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document

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Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). Adams is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

# //RA//

Leonard D. Wert, Chief Reactor Projects Branch 3 Division of Reactor Projects

Docket Nos.: 50-250, 50-251 License Nos.: DPR-31, DPR-41

Enclosure: Inspection Report 50-250/02-03, 50-251/02-03 w/Attachment - Supplemental Information

cc w/encl: T. O. Jones Plant General Manager Turkey Point Nuclear Plant Florida Power and Light Company Electronic Mail Distribution

John P. McElwain Site Vice President Turkey Point Nuclear Plant Florida Power and Light Company 9760 SW 344th Street Florida City, FL 33035

Walter Parker Licensing Manager Turkey Point Nuclear Plant Florida Power and Light Company Electronic Mail Distribution

Don Mothena, Manager Nuclear Plant Support Services Florida Power & Light Company Electronic Mail Distribution

cc w/encl: (Continued See page 3)

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cc w/encl: (Continued) Rajiv S. Kundalkar Vice President - Nuclear Engineering Florida Power & Light Company Electronic Mail Distribution

M. S. Ross, Attorney Florida Power & Light Company Electronic Mail Distribution

Jim Reed Document Control Supervisor Florida Power & Light Company Electronic Mail Distribution

Attorney General Department of Legal Affairs The Capitol Tallahassee, FL 32304

William A. Passetti Bureau of Radiation Control Department of Health Electronic Mail Distribution

County Manager Metropolitan Dade County Electronic Mail Distribution

Craig Fugate, Director Division of Emergency Preparedness Department of Community Affairs Electronic Mail Distribution

Curtis Ivy City Manager of Homestead Electronic Mail Distribution

# U.S. NUCLEAR REGULATORY COMMISSION

# **REGION II**

Docket Nos.:	50-250, 50-251
License Nos.:	DPR-31, DPR-41
Report Nos.:	50-250/02-03, 50-251/02-03
Licensee:	Florida Power & Light Company (FPL)
Facility:	Turkey Point Nuclear Plant, Units 3 & 4
Location:	9760 S. W. 344 <sup>th</sup> Street Florida City, FL 33035
Dates:	June 30 - September 28, 2002
Inspectors:	C. Patterson, Senior Resident Inspector R. Reyes, Resident Inspector S. Rudisail, Project Engineer (Sections 1R01, 1R06)
Approved by:	L. Wert, Chief Reactor Projects Branch 3 Division of Reactor Projects

# SUMMARY OF FINDINGS

Inspection Report 05000250-02-03, 05000251-02-03, Florida Power & Light, on 06/30/2002 - 09/28/2002, Turkey Point Nuclear Power Plant, Units 3 & 4, One finding in Maintenance Rule Implementation.

The inspection was conducted by the resident inspectors and a project engineer. One finding of very low safety significance (Green) was identified in the Maintenance Rule Implementation area. The significance of issues is indicated by their color (Green, White, Yellow, Red) and was determined by the Significance Determination Process in the NRC Inspection Manual Chapter 0609. Findings to which the SDP does not apply are indicated by "No Color" or by the severity level of the applicable violation. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

# A. Inspector Identified Findings

# Cornerstone: Mitigating Systems

Green. The licensee did not correctly assess and take corrective action when the Residual Heat Removal (RHR) sump pumps performance goals were not met. This is a violation of the Maintenance Rule, 10 CFR 50.65. The system had not been placed into status a(1) when multiple failures caused the established performance goals to not be met.

This finding was of very low safety significance because it involved administrative implementation of the Maintenance Rule, and the probability of a flooding event that could impact both trains of the RHR system was extremely low. (Section 1R12).

# B. Licensee Identified Findings

A violation of very low safety significance, which was identified by the licensee, was reviewed by the inspectors. Corrective actions taken or planned by the licensee have been entered into the licensee's corrective action program. The violation and corrective action tracking number are listed in Section 4OA7 of this report.

# **Report Details**

# Summary of Plant Status:

Unit 3 and Unit 4 operated at power during this inspection period.

# 1. **REACTOR SAFETY**

# Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity (Reactor-R)

# 1R01 Adverse Weather Protection

# a. Inspection Scope

The inspectors reviewed the licensee's hurricane season preparations. The inspectors verified the actions completed as required by Emergency Preparedness Administrative Directive EP-AD-009, Hurricane Season Preparation. Additionally, Condition Report (CR) 02-1243 was reviewed. This CR was initiated for several items that had not been completed as required by EP-AD-009. The CR was closed and the actions required by the EP were completed. The inspectors also completed a review of procedures, walkdowns of the areas around the plant for potential missile hazards, and reviewed the actions specified in EP-AD-009. Plant procedures O-EPIP-20106, Natural Emergencies; and O-ONOP-103.3, Severe Weather Preparations were also reviewed to assess the licensee's overall preparedness for hurricane conditions.

a. Findings

No findings of significance were identified.

# 1R04 Equipment Alignment

- .1 Partial System Walkdown
  - a. Inspection Scope

The inspectors conducted partial walk down inspections to verify the alignment of redundant trains/systems when the other train/system was out-of-service. The inspectors reviewed the licensee's operating procedure, Updated Final Safety Analysis Report (UFSAR) system description, and system drawings to determine that the systems were correctly aligned. The following systems were inspected:

- 4B, 3A, and 3B Emergency Diesel Generators (EDGs) while the 4A EDG was out of service for maintenance.
- 3A, 4A, and 4B High Head Safety Injection (HHSI) pumps while the 3B HHSI was out of service for maintenance
- b. Findings

No findings of significance were identified.

#### .2 Complete System Walkdown

The inspectors conducted a complete walk down of the Unit 3 and Unit 4 Auxiliary Feedwater (AFW) System train one during the period when train two was out of service for repair of the steam piping. The alignment verification also included reviewing the 'C' pump alignment to train one, as the 'C' pump is normally aligned to train two. The inspectors reviewed the train two planned maintenance work with the maintenance supervisor to verify that none of the maintenance activities would make any equipment on train one inoperable. The reviewed documents to verify the correct alignment of train one included the AFW operating and alignment procedures, drawings, and equipment clearance order ECO 0-02-08-023. Additionally, the inspectors reviewed deficiency tags on the AFW system to verify that the identified discrepancies would not make the AFW train inoperable.

b. Findings

No findings of significance were identified.

- 1R05 Fire Protection
  - a. Inspection Scope

The inspectors toured selected plant areas to evaluate conditions related to control of transient combustibles and ignitions sources, the material condition and operational status of fire protection systems, and selected fire barriers used to prevent fire damage or fire propagation. The inspectors reviewed these activities against provisions in the licensee's Fire Protection Plan and 10 CFR Part 50, Appendix R. The followings areas were inspected:

- Unit 3 and Unit 4 Auxiliary Building Hallway, Fire Zone 58
- Unit 4 Containment Spray Pump Room, Fire Zone 31
- Unit 4 Pipe and Valve Room, Fire Zone 30
- Unit 4 Charging Pump Room, Fire Zone 45
- Unit 3 Charging Pump Room, Fire Zone 55

The inspectors also reviewed the compensatory measures, required by 4-OP-023, Emergency Diesel Generator, if an EDG out of service time extends past 72 hours.

On July 11, 2002, the inspectors observed conduct of a fire drill. The drill scenario simulated a fire on a fuel delivery truck that was transporting propane gas. Prior to the drill, the inspectors reviewed the drill scenario, objectives, and the expected firefighting techniques with the fire protection supervisor. To verify that licensee drill objectives were completed satisfactorily, during the drill the inspectors noted the timing for the fire brigade to arrive at the fire scene, command and control of the brigade team leader, communications, and expected fire fighting techniques, which included identifying and addressing the chemical fire. After the drill, the inspectors attended the drill critique to verify the licensee had addressed any identified issues that were noted during the drill. The inspectors also reviewed the drill evaluation report.

# b. Findings

No findings of significance were identified.

# 1R06 Flood Protection Measures

# a. Inspection Scope

The inspector reviewed UFSAR Section 5.F, Internal Plant Flooding, including related figures and drawings, Procedure 0-ONOP-103.3, Severe Weather Preparations; and Procedure 0-EPIP-20106, Natural Emergencies, to identify areas that may be affected by internal or external flooding, design flood levels, and protection features for areas containing safety-related equipment. The inspector verified that flooding mitigation structures and equipment were consistent with the design requirements. The inspector walked down various areas protected for flooding, and verified that the requirements of 0-ONOP-102.1, Flood Protection Stoplog and Penetration Seal Inspection, were being met. The inspector reviewed flood protection measures for the 4160 Volt switchgear rooms and the EDG rooms. The inspector reviewed the maintenance records for the sump pumps in the Residual Heat Removal (RHR) sumps. The inspector reviewed CRs related to flooding events and flood protection and verified the issues were being addressed adequately. Additionally, CR 01-0674 was reviewed. This CR documents the ongoing effort to clean and inspect manholes at the site and ensure flooding conditions in the manholes are minimized. Other flood related CR's were reviewed.

b. Findings

No findings of significance were identified.

# 1R07 Heat Sink Performance

a. Inspection Scope

The inspector reviewed the Unit 3 and Unit 4 Component Cooling Water (CCW) heat exchanger thermal performance testing that had been conducted in the months of July and August, 2002. The CCW system is a safety related high risk significant system at Turkey Point. The licensee conducts these tests regularly to obtain the heat exchanger thermal performance capability to verify continued CCW operability. On September 9, 2002, the inspectors observed the surveillance tests on Unit 3 and 4, 3/4-OSP-030.4, Component Cooling Water Heat Exchanger Performance Test, to verify the licensee was obtaining the required data to adequately assess the heat exchanger thermal performance. The inspectors reviewed the issues and corrective actions associated with CR 02-1568, 3B CCW Heat Exchanger Failed 3-OPS-30.4 Performance Testing, to verify the licensee's corrective actions relating to this issue properly addressed the causes of the issue.

# b. Findings

No findings of significance were identified.

#### 1R11 Licensed Operator Regualification

#### a. Inspection Scope

On August 14, 2002, the inspectors observed licensed operator re-qualification training on the control room simulator. The inspectors reviewed lesson plan 760000101, Reactor Startup With NIS Failures, which was used as the scenario for the training. Prior to the startup, the inspectors attended the pre-evolution briefing, and walked down the control room simulator to verify the initial conditions were as described in the lesson package. The inspectors followed the scenario as the issues with the unit developed to verify the operator responses were completed as expected. The inspectors attended the subsequent training critique to verify that issues identified during the training were addressed.

#### b. Findings

No findings of significance were identified.

#### 1R12 Maintenance Rule Implementation

#### a. Inspection Scope

The inspectors assessed the effectiveness of maintenance on selected structures, systems, and components scoped into the maintenance rule, (10 CFR 50.65) and verified procedural requirements specified in procedure 0-ADM 728, Maintenance Rule Implementation. The inspectors reviewed the characterization of failures, safety significance classifications, and the appropriateness of performance criteria and corrective actions for the following condition reports (CRs):

- CR 02-1186 RHR Heat Exchanger Room Sump Pump
- CR 02-1412 3CD Air Compressor Trip on High Engine Temperature
- CR 02-1242 3B EDG Exceeded Its Maintenance Rule Performance Criterion

# b. Findings

The inspectors identified a Green finding that was determined to be a Non-cited Violation (NCV) for failure to take corrective action required by the Maintenance Rule, 10 CFR 50.65, when the RHR Heat Exchanger room sump pumps failed to operate. The licensee did not correctly categorize the failure as a Maintenance Preventable Functional Failure (MPFF). After questioning by the inspectors, a comprehensive review was conducted and all the RHR sumps (six total) were placed in a(1) status.

On June 10, 2002, a Unit 4 RHR Heat Exchanger Room Sump High Level Alarm was received in the Control Room. The licensee evaluated this condition under CR 02-1186. The licensee concluded that the cause of the failure of the pumps to remove the water was due to maintenance on the pump alternator float. This float switch had been removed from the system on March 1, 2002, and left removed until the high level alarm was reviewed. The licensee concluded this was not a MPFF since Operations made a

personnel error in not logging this equipment in the out of service log. It was concluded that since personnel errors are not considered a MPFF, that no goal setting or increased monitoring was required.

The inspector reviewed the completed CR 02-1866 and questioned why this was not a MPFF since it appeared that maintenance activities had caused the problem. The inspectors also questioned whether the system should have been placed into a(1) status given there had been a series of problems with the sump pumps. The licensee then initiated CR 02-1500 to review the RHR sumps. A comprehensive review was conducted of all the system failures over the past year and the RHR sumps were placed in status a(1). The CR stated that a lack of preventive maintenance eventually led to the failure of almost every sump component ( pumps, alternator/level switch, and alarm level switch) at least once.

This maintenance rule issue was reviewed against the guidance in NRC Inspection Manual Chapter 0612\* to determine if it was a minor violation. Since the system status changed from a(2) to a(1), it was determined to be more than a minor violation. This finding was of very low safety significance because it involves administrative implementation of the Maintenance Rule and the probability of a flooding event that could impact both trains of the RHR system operation remained very low. This maintenance rule issue has cross cutting aspects similar to the corrective action problems identified in the NRC Problem Identification and Resolution Inspection Report, 50-250,251/02-05. This report identified that corrective action was not fully effective in preventing repetitive failures of charging pumps and important electrical breakers.

10 CFR 50.65 (a)(1) requires, in part, that holders of an operating license shall monitor the performance or condition of structures, systems, or components (SSCs) against licensee-established goals, in a manner sufficient to provide reasonable assurance that such SSCs are capable of fulfilling their intended functions. When the performance or condition does not meet established goals, appropriate corrective action shall be taken. Contrary to this, the licensee did not properly characterize or assess repetitive problems with the RHR sump pumps. The licensee did not recognize that the goals set for the system were not met. Following inquiry by the inspectors, a comprehensive review of all the cumulative failures as documented in CR 02-1500 resulted in all RHR sumps on both units (six total) being placed in status a(1). This violation is being treated as NCV 250,251/02-03-01, Failure to take Corrective Action Required by the Maintenance Rule for RHR Sump Pump Failures. This issue is also discussed in Section 40A2.

#### 1R13 Maintenance Risk Assessments and Emergent Work Control

#### a. Inspection Scope

The inspectors reviewed the following emergent items, as described in the referenced CRs or work orders (WOs). The inspectors verified that the emergent work activities were adequately planned and controlled, as described in 0-ADM-068, Work Week Management and O-ADM-225, On Line Risk Assessment and Management. The

inspectors verified that, as appropriate, contingencies were in place to reduce risk, minimize time spent in increased risk configurations, and to avoid initiating events. The following items were reviewed:

- CR 02-1332 4D Normal Containment Cooler Failure
- CR 02-1348 Operation of EDG valves under clearance
- WO 30017556 C AFW Pump Operable with A & B pumps out of service
- CR 02-1639 AFW Steam Piping External Corrosion
- CR 02-1486 Rod Position Indicator C9 Erratic Position

CR 02-1639 concerning external corrosion of the AFW steam piping is also discussed in Section 4OA2.

# b. Findings

No findings of significance were identified.

# 1R15 Operability Evaluations

#### a. Inspection Scope

The inspectors reviewed the selected operability evaluations affecting mitigating systems and barrier integrity to determine that operability was justified and no unrecognized increase in risk had occurred. The inspectors verified procedural requirements as described in 0-ADM-518, Condition Reports. The following list of CRs and documents were reviewed:

- CR 02-1304 HHSI Pump Minor Air Bubbles Vented
- CR 02-1393
  4B EDG Crack in Exhaust Duct
  - CR 02-1094 AFW Pump Low Oil Lube Pressure
    - 3A CCW Pump Breaker Failure

3A Battery Low Cell Voltage

- 3B CCW Heat Exchanger Performance Test
- CR 02-1568
  CR 02-1209

CR 02-1544

# b. <u>Findings</u>

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No findings of significance were identified.

# 1R17 Permanent Plant Modifications

# a. Inspection Scope

The inspector reviewed permanent plant modification PC/M 02-057 associated with the Unit 3 Boric Acid To Blender Check Valve, 3-355, on the risk significant Chemical and Volume Control System. The purpose of the modification was to replace the 3-355 check valve with a new check valve of the same design to minimize back leakage through the check valve seat. The inspectors performed a pre-implementation walk down and a post implementation walk down with the responsible system engineer to verify the system had been modified as described in the PC/M. The inspectors reviewed

the revised procedures and drawings to verify they had been adequately revised to reflect the modification. During implementation of the PC/M, the inspectors reviewed the alternate boration flow path to verify the licensee had an operable boration flow path, and reviewed the Unit 3 control room logs and operations activities to verify compliance with TS requirements.

b. Findings

No findings of significance were identified.

# 1R19 Post-Maintenance Testing

a. Inspection Scope

For the post maintenance tests listed below, the inspectors reviewed the test procedures and either witnessed the testing and/or reviewed test records to determine whether the scope of testing adequately verified that the work performed was correctly completed and demonstrated that the affected equipment was functional and operable. The inspectors verified that the requirements of procedure 0-ADM-737, Post Maintenance Testing, were incorporated into test requirements. The inspectors reviewed the following list of tests:

- 4-OSP-023.1 4 Diesel Test After Overhaul
- WO 32012957 3 CD Air Compressor
- CR 02-1544 3A CCW Pump Breaker
- WO 32006806 3B HHSI Pump
- WO 32015112 AFW Steam Pipe Replacement
- b. Findings

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No findings of significance were identified.

# 1R22 <u>Surveillance Testing</u>

a. Inspection Scope

The inspectors verified by witnessing surveillance tests and/or reviewing test data, that selected surveillance tests met the TS, the UFSAR, and licensee procedure requirements and demonstrated the systems were capable of performing their intended safety functions and their operational readiness. The following surveillances were reviewed:

- 0-OSP-202.3 Safety Injection Pump and Piping Venting
  - 4-OSP-030.1 Component Cooling Water Pump Inservice Test
    - 4-PMI-028.2 Axial Flux, Rod Deviation and Rod Position Indicator Monthly Test
- 3-OSP-024.2 3B Emergency Bus Load Sequence Manual Test

0-OSP-062.2 Safety Injection System Inservice Test
 3/4-OSP-030.4 Component Cooling Water Heat Exchanger Performance Test

# b. Findings

No findings of significance were identified.

# **Cornerstone: Emergency Preparedness (EP)**

# 1EP6 Drill Evaluation

a. Inspection Scope

On August 27, 2002, the inspectors observed the conduct of the 2002 Emergency Preparedness Off Year Exercise. The drill scenario included an Alert notification due to an Anticipated Transient Without Scram, which eventually escalated to a General Emergency notification as a result of an reactor coolant system leakage greater than charging pump capacity and loss of containment integrity. The inspectors observed the activation and the conduct of activities in the Technical Support Center. The inspectors monitored the drill scenario as the technical issues on Unit 3 escalated to verify the licensee adequately implemented the emergency preparedness procedures, including a deviation from Emergency Operating Procedures using the 50.54X process. The inspectors observed the assessments and NRC notifications of emergency classifications, and the Protective Action Recommendations. After the drill, the inspectors observed the drill critique to verify the licensee had adequately captured the issues that were observed during the drill.

b. Findings

No findings of significance were identified.

# 3. SAFEGUARDS

# **Cornerstone:** Physical Protection (PP)

# 3PP3 Response to Contingency Events (71130.03)

The Office of Homeland Security (OHS) developed a Homeland Security Advisory System (HSAS) to disseminate information regarding the risk of terrorist attacks. The HSAS implements five color-coded threat conditions with a description of corresponding actions at each level. NRC Regulatory Information Summary (RIS) 2002-12a, dated August 19, 2002, "NRC Threat Advisory and Protective Measures System," discusses the HSAS and provides additional information on protective measures to licensees.

#### a. Inspection Scope

On September 10, 2002, the NRC issued a Safeguards Advisory to reactor licensees to implement the protective measures described in RIS 2002-12a in response to the Federal government declaration of threat level "orange." Subsequently, on September 24, 2002, the OHS downgraded the national security threat condition to "yellow" and a corresponding reduction in the risk of a terrorist threat.

The inspector interviewed licensee personnel and security staff, observed the conduct of security operations, and assessed licensee implementation of the threat level "orange" protective measures. Inspection results were communicated to the region and headquarters security staff for further evaluation.

#### b. Findings

No findings of significance were identified.

# 4. OTHER ACTIVITIES

- 4OA2 Identification and Resolution of Problems
- .1 RHR Sump Pumps
- a. Inspection Scope

The inspectors reviewed completed CR 02-1186, RHR Heat Exchanger Room Sump Pump 4A, to determine if the problem was adequately addressed. (Section 1R12 of this report also describes review of this issue).

#### b. Findings and Issues

The CR did not provide a comprehensive critical review of the failure or failures of the system. Following discussion with licensee management, CR 02-1500 was written and the licensee performed a comprehensive review of the system failures over the year and concluded that a lack of preventive maintenance eventually lead to the failure of every sump component (pump, alternator/level switch, and alarm level switch) at least once. Following review by the maintenance rule expert panel, all RHR sumps on both units (six total) were placed in status a(1). NCV 50-250,251/02-03-01, Failure to take corrective Actions Required by the Maintenance Rule for RHR Sump Pump Failures (Section 1R12) addresses this issue. The inspectors noted that a previous violation, NCV 50-250,251/00-04-01, Failure to Have RHR Room Sump Level Switches in the Maintenance Rule, had been identified involving these same plant components. The level switches had not been included in the scope of the maintenance rule and some were found not functional when they were subsequently tested.

#### .2 AFW Steam Supply Piping Corrosion

#### a. Inspection Scope

The inspectors reviewed CR 02-1639 to evaluate the licensee's corrective action for external corrosion on AFW steam supply piping.

#### b. Findings and Issues

CR 02-1639 was written to address a condition involving the AFW steam supply piping which was identified during surveillance testing. Water was observed to be coming out from under the piping insulation. Subsequent investigation indicated that external corrosion, likely due to rain water intrusion, had resulted in thinning of the pipe wall. LER 50-250,251/98-001, Manual Reactor Trip due to Loss of Turbine Oil Pressure, with Steam Leak in Auxiliary Feedwater Steam Supply Piping; discusses a steam leak that occurred when AFW initiated after a plant trip in 1998. The cause of the steam line break was due to external corrosion and a number of corrective actions were initiated. The inspectors reviewed why the previous corrective action did not prevent this recent problem. The licensee had used some screening criteria to eliminate certain areas of piping from inspection. Areas inside the AFW cage were screened out because it was thought that rain water would not contact piping here due to overhead structures blocking the rain. The inspectors observed the AFW cage area during a rain storm and noted water entered the area in several locations. The inspectors continue to review the licensee's AFW steam supply piping inspections and repair activities.

# 4OA3 Event Follow-up

# (Closed) Licensee Event Report (LER) 50-250/2002-01-00, Vital Battery Cell Voltage Below Technical Specification Allowable

On June 5, 2002, the 3A vital battery individual cell voltage was measured below the value allowed in TS 4.8.2.1.b. Due to a personnel error, this information was not processed until June 17, 2002. The licensee recognized at that time that the two hour limit permitted by TS 3.8.2.1 for an inoperable vital battery had been exceeded. The 3A battery was declared inoperable and the spare battery placed in service. The individual cell voltage was 2.06 volts direct current compared to the minimum of 2.07. An evaluation was performed that concluded the battery was capable of performing its design load profile. The cell was replaced. Corrective actions included training personnel and making procedure changes to enhance the proper notifications. This LER was dispositioned as a NCV in section 40A7 of the report. This LER is closed.

# 4OA6 Meetings, including Exit

# Exit Meeting Summary

The inspectors presented the inspection results to members of licensee management at the conclusion of the inspection on October 3, 2002. The licensee acknowledged the findings presented.

The inspectors asked the licensee whether any of the material examined during the inspection should be considered proprietary. No proprietary information was identified.

#### 4OA7 Licensee Identified Violations.

The following violation of very low significance (green) was identified by the licensee and is a violation of NRC requirements which met the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600, for disposition as a non-cited Violation (NCV).

Technical Specification 3.8.2.1 prohibits operation greater than two hours with an inoperable vital battery. Due to personnel errors, an individual cell voltage was below the TS required minimum for 12 days. A detailed evaluation of the condition by the licensee determined that the battery was capable of meeting its safety function. This issue was discussed in CR 02-1209 and was evaluated as having very low safety significance by phase 1 of the reactor safety Significance Determination Process.

# **Supplemental Information**

# A. PARTIAL LIST OF PERSONS CONTACTED

<u>Licensee</u>

- E. Avella, Maintenance Manager
- G. Hollinger, Protection Services Manager
- T. Jones, Plant General Manager
- C. Kinne, Acting Health Physics Supervisor
- M. Lacal, Operations Manager
- G. Laughin, Acting Training Manager
- D. Lowens, Quality Assurance Manager
- J. McElwain, Site Vice-President
- W. Parker, Licensing Manager
- W. Prevatt, Work Control Manager
- G. Warriner, Acting Quality Assurance Manager
- A. Zielonka, Site Engineering Manager

Other licensee employees contacted included office, operations, engineering, maintenance, chemistry/radiation, and corporate personnel.

# <u>NRC</u>

- L. Wert, Branch Chief
- L. Reyes, Regional Administrator
- S. Collins, Director, Nuclear Reactor Regulation

# **B. ITEMS OPENED AND CLOSED**

Opened and Closed

50-250,251/02-03-01 NCV

Failure to take Corrective Action Required by the Maintenance Rule for RHR Sump Pump Failures (Section 1R12)

Attachment

FPL

Distribution w/encl: E. Brown, NRR C. Evans (Part 72 Only) RIDSNRRDIPMLIPB PUBLIC

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