



September 18, 1978  
L-78-303

Mr. James P. O'Reilly, Director, Region III  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 3100

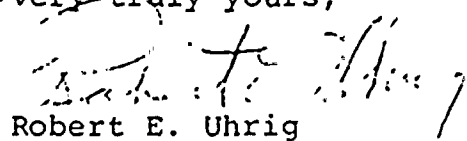
Dear Mr. O'Reilly:

Re: RII:EHV  
50-250/78-12  
50-251/78-12

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

There is no proprietary information in the report.

Very truly yours,

  
Robert E. Uhrig  
Vice President

REU/MAS/dlh

Attachment

cc: Robert Lowenstein, Esquire

7810240071

## ATTACHMENT

Re: RII:EHV  
50-250/78-12  
50-251/78-12

### Finding A

Technical Specifications, Section 6.8.1 requires that written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI 18.7-1972 and Appendix "A" to Regulatory Guide 1.33. Section 8.1.2 of Administrative Procedure 0190.19 (Control of Maintenance on Nuclear Safety Related Systems) requires that the Assistant Superintendent Nuclear Maintenance, Electrical Maintenance, I&C Supervisor or their designees will approve the Plant Work Order (PWO) in the Nuclear Supervisor approval signature block.

Contrary to the above, during the period of September 2, 1976 to May 17, 1978 seven Plant Work Orders (PWO Nos. 0336, 1657, 1745, 2319, 2372, 7542, 7746) were missing the Nuclear Supervisor signature.

### Response A

The procedure referenced in the Finding was approved on October 18, 1977. The previous version of the procedure, which was approved on August 6, 1975, did not require the Nuclear Supervisor block to be signed off. Four of the PWOs listed were dated prior to October 18, 1977. Specifically, PWO 0336 was dated June 24, 1977, PWO 1657 was dated March 22, 1977, PWO 2745 (listed in the inspection report as 1745) was dated January 13, 1977, and PWO 2372 was dated July 8, 1976. For these PWOs the lack of a signature does not constitute noncompliance because, at the time they were written, there was no requirement to sign the Nuclear Supervisor block.

The purpose of the signature requirement is to ensure that proper controls are applied to nuclear safety related work. The three remaining PWOs listed in the Finding were reviewed from that standpoint. It was found that each one had the "Nuclear Safety Related - Yes" block and the appropriate Radiation Work Permit block checked, and that procedures were listed when they were required to do the work. This indicates that the review, which should have been documented by a signature in the Nuclear Supervisor block, was performed. Thus, we have concluded that the Finding does not represent a failure to perform the PWO review, but represents a failure to document the review.

Supervisory personnel from each of the four maintenance departments onsite (Electrical, Instrument and Control, Primary Mechanical, and Secondary Mechanical) have initiated internal action to ensure that all PWO's are signed in the Nuclear Supervisor block as required by procedure. This action provides reasonable assurance that the Finding will not recur. Based on the steps taken to prevent recurrence, compliance was achieved on September 13, 1978.

## Finding B

Criterion II of Appendix B to 10 CFR 50 states that the quality assurance program shall provide control over activities affecting quality of the identified structures systems and components to an extent consistent with their importance to safety. Appendix C to the FP&L Topical Quality Assurance Report states that the Quality Assurance Program is committed to ANSI N18.7-1972. Section 5.3.5 of ANSI N18.7-1972 states that permission to release equipment or systems for maintenance shall be granted by responsible operating personnel and that the granting of the permission by the Operations Group shall be documented.

Contrary to the above, documentation could not be provided for the period of March 14, 1977, to June 5, 1978, that showed that six Plant Work Orders (PWO Nos. 0453, 1623, 2204, 2375, 7541, 7849) had received the operational release as required.

## Response B

As discussed in the inspection report, the standard method for documenting operations release of equipment or systems for maintenance is by operations approval of the equipment clearance order used to take the equipment or system out of service. The intent of the clearance program has been to ensure that sources of energy are properly isolated so that they will not be hazards to personnel and equipment when maintenance is being performed. Hence, the clearance program does not require issuing a clearance to perform maintenance when that maintenance would not expose personnel or equipment to a potentially hazardous energy source, such as live electrical circuits or pressurized piping. In the case where a clearance is not issued for a maintenance activity, there is now no formalized mechanism of documenting operations approval of the maintenance activity. In such cases, established informal verbal communications between the maintenance and operations departments has been used to ensure that operations department approval is granted prior to starting maintenance work, but this approval has not been documented in all cases. In order to implement a formal mechanism to meet the requirement to document operations approval in all cases, a program change will have to be made. It is not presently known what form this change will take, nor when the change can be implemented. By October 31, 1978 we intend to provide an implementation date for whatever changes are needed to achieve compliance.

### Finding C

Technical Specification (TS) Section 6.8.1 requires that written procedures be established, implemented and maintained that meet or exceed the requirements and recommendation of Sections 5.1 and 5.3 of ANSI N18.7-1972. Section 5.8 of Administrative Procedure (AP) 0103.4, In Plant Equipment Clearance Order, requires in part that all clearances on nuclear safety-related systems or equipment listed in TS 3.0 shall be given proper review before issuance by the Nuclear Watch Engineer or Nuclear Plant Supervisor and a Licensed Senior Reactor Operator. Their approvals are to be indicated by use of a stamp labeled "Nuclear Safety Related."

Contrary to the above, during the period of March 8, 1978, to June 26, 1978, four clearances on nuclear safety related equipment (Unit 3 Clearance No. 6-102, Unit 4 Clearances Nos. 3-27, 6-5 and 6-59) were not properly approved or marked to indicate that they were nuclear safety-related.

### Response C

To help prevent recurrence of this Finding, Operating Procedure 0204.2, "Schedule of Periodic Tests, Checks, Calibrations and Operating Evolutions," will be revised to require the Nuclear Plant Supervisor to review, on a daily basis, the clearances written during the previous 24 hour period to verify compliance with the Administrative Procedure 0103.4 procedural requirements for clearance review, stamping, and stamp sign-off. This procedure change will be reviewed by the Plant Nuclear Safety Committee by October 15, 1978. In addition, in order to ensure that operators understand the procedural requirements and the necessity for full compliance, a letter on this subject will be issued to them by plant management.

Compliance will be achieved when the change to Operating Procedure 0204.2 is issued, which should be about October 31, 1978.