

ATLANTA REGION II
ATLANTA, GEORGIA

78 NOV 3 P 2: 25



October 31, 1978
L-78-348

Entab file
50-250
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Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII:MVS
50-250/77-28
50-251/77-28

The purpose of this letter is to conclude our reporting of Boron Injection Tank inspection results at Turkey Point Units 3 and 4.

Examinations:

1. Visual inspections of interior -

PTP-4	November 2, 1977
PTP-3	December 15, 1977
PTP-4	August 25, 1978

These internal inspections showed the tanks to be free of defects.

2. Liquid Penetrant Examination on the inside of the 6 inch outlet nozzle-to-pipe weld

PTP-3	December 29, 1977
PTP-4	August 31, 1978

No relevant indications were detected on Unit 3. On Unit 4, 17 relevant round indications were found on the first test. The area was polished and re-examined, and no relevant indications were found.

Replacements:

On both units the original 2 thermowells and 2 couplings were removed and sent to our NSSS vendor for analysis. Their report showed the parts to be sensitized.

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James P. O'Reilly, Director, Region II
Page Two

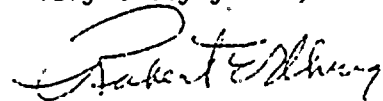
Replacement parts were installed on the following dates.

PTP-3 January 26, 1978
PTP-4 March 3, 1978

All welds, i.e. thermowells-to-couplings (shop weld) and couplings-to-pipe nozzle (field weld) were liquid penetrant tested after the root and final passes. No relevant indications were detected.

This completes all inspection and reporting activities for both Units 3 and 4. No new activities are planned.

Very truly yours,



Robert E. Uhrig
Vice President

REU/MAS/cpc

cc: Robert Lowenstein, Esquire



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
230 PEACHTREE STREET, N.W. SUITE 818
ATLANTA, GEORGIA 30303
JAN 27 1978

Central file
50-250
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In Reply Refer To:
RII:MVS
50-250/77-28
50-251/77-28

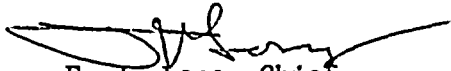
Florida Power and Light Company
Attn: Dr. R. E. Uhrig, Vice President
of Nuclear and General
Engineering
P. O. Box 013100
9250 West Flagler Street
Miami, Florida 33101

Gentlemen:

Thank you for your letter of January 17, 1978, informing us of steps you have taken to correct the deviation concerning activities under NRC Operating License Nos. DPR-31 and DPR-41 brought to your attention in our letter of December 21, 1977. We will examine your corrective actions and plans during subsequent inspections.

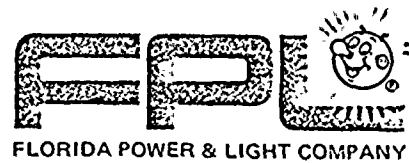
We appreciate your cooperation with us.

Sincerely,


F. J. Long, Chief
Reactor Operations and
Nuclear Support Branch

cc: Mr. H. E. Yaeger, Plant Manager
Turkey Point Plant
P. O. Box 013100
9250 West Flagler Street
Miami, Florida 33101

[Handwritten mark]



January 17, 1978
L-78-18

Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
230 Peachtree Street, N. W., Suite 1217
Atlanta, GA 30303

Dear Mr. O'Reilly:

Re: RII:MVS
50-250/77-28
50-251/77-28

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,

R. E. Uhrig
Vice President

REU/MAS/lah

Attachment

cc: Robert Lowenstein, Esquire

ATTACHMENT

Re: RII:MVS
50-250/77-28
50-251/77-28

Finding

FSAR Table 6.2-5 states that the boron injection tanks are constructed of austenitic stainless steel.

Contrary to these specifications the boron injection tanks at Turkey Point Units 3 and 4 are constructed of carbon steel lined internally by 5/32 inch stainless steel.

Response

Both boron injection tanks (BITs) at Turkey Point are constructed with stainless steel clad (roll bonded Type 304L) on carbon steel. The housings on the thermowells are 100% stainless steel (Type 304). As a result of boron injection tank anomalies at another utility, the Turkey Point tanks have been evaluated to verify their continued operational integrity. The following inspections have been performed:

UNIT 4

A visual inspection of the inside of the Unit 4 BIT has been performed. The inside of the tank was specifically examined for blistering. Also examined were the tank seam welds, the inside weld on the Schedule 80 pipe housing the thermowell, and the weld making the transition from the inner diameter (I.D.) of the tank to the manway. The examinations showed the tank to be internally free of pitting, blistering, and weld corrosion.

A liquid penetrant test has been performed. The two thermowell couplings and the fillet welds joining the couplings to the tubes were examined. The examinations showed no abnormalities.

UNIT 3

A visual inspection of the inside of the Unit 3 BIT has been performed. The inspection areas were the same as for the Unit 4 inspections, and the conclusions were also the same.

In lieu of a thermowell liquid penetrant test, the two thermowell couplings have been radiographed. The radiographs of both thermowells showed that, although the two pipe nipples connected by the coupling were bottomed out against the coupling shoulder, the units had good integrity.

A liquid penetrant test of the weld on the I.D. of the outlet nozzle was performed. No abnormalities were detected.

Two stainless steel (Type 304) couplings, one with a pipe nozzle (Type 304) and one without, were removed from the Unit 3 BIT for destructive metallurgical analysis by our NSSS vendor. The couplings were sectioned and their metallurgical structures were evaluated for susceptibility to intergranular attack (as determined by ASTM Specification A262-75, Practice A, oxalic acid test). The tests showed no indication of intergranular corrosion attack.

The tentative plan for the Unit 4 BIT is to (1) visually inspect the inside of the tank again, (2) remove one thermowell coupling for destructive metallurgical analysis, and (3) perform a liquid penetrant test of the weld on the I.D. of the outlet nozzle. This additional work is planned for the next Unit 4 refueling outage (scheduled for midsummer 1978). The results will be forwarded to the Region II Office of Inspection and Enforcement within 30 days of the end of the outage.

As described above, all boron injection tank inspections to date have verified tank integrity. The additional inspections planned for Unit 4 are expected to provide further verification. Therefore, based on the information we have at this time, we have concluded that the existing tanks are in compliance with the intent of the FSAR which is to provide a source of borated water for injection into the RCS under specific conditions. The Plant Nuclear Safety Committee and the Company Nuclear Review Board will review this item for concurrence with the final disposition.

The deviation in question apparently occurred during construction of Turkey Point Units 3 and 4. Since then, the administrative control of plant modifications has been considerably upgraded. The present controls should act to prevent recurrence of such deviations.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
230 PEACHTREE STREET, N.W. SUITE 1217
ATLANTA, GEORGIA 30303

DEC 21 1977

In Reply Refer To:

RII:MVS

50-250/77-28

50-251/77-28

Florida Power and Light Company
Attn: Dr. R. E. Uhrig, Vice President
of Nuclear and General
Engineering

P. O. Box 013100
9250 West Flagler Street
Miami, Florida 33101

Gentlemen:

This refers to the inspection conducted by Mr. M. V. Sinkule of this office on November 28 - December 2, 1977, of activities authorized by NRC Operating License Nos. DPR-31 and DPR-41 for the Turkey Point 3 and 4 facilities, and to the discussion of our findings held with Mr. H. E. Yaeger at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

We have examined actions you have taken with regard to previously reported unresolved items. The status of these items is discussed in the enclosed report.

One new unresolved item resulted from this inspection and is discussed in the enclosed report. This item will be examined during subsequent inspections.

During the inspection it was found that certain activities under your license appear to deviate from commitments to the Commission and have safety significance. This item is identified in the Notice of Deviation enclosed herewith as Appendix A. Please provide us in writing within 20 days of your receipt of this letter your comments including a description of corrective actions that have been or will be taken, corrective actions which will be taken to avoid further deviations, and the date corrective actions were or will be completed.

9

DEC 2 1977

Florida Power and Light Co.

-2-

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include a full statement of the reasons on the basis of which it is claimed that the information is proprietary, and should be prepared so that proprietary information identified in the application is contained in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

for R.C. Lewis
F. J. Long, Chief
Reactor Operations and
Nuclear Support Branch

Enclosures:

1. Appendix A, Notice of Deviation
2. RII Inspection Rpt. Nos.
50-250/77-28 and 50-251/77-28

cc w/encl:

Mr. H. E. Yaeger, Plant Manager
Turkey Point Plant
P. O. Box 013100
9250 West Flagler Street
Miami, Florida 33101

DEC 21 1977

APPENDIX A

NOTICE OF DEVIATION

Florida Power and Light Company

License Nos. DPR-31
DPR-41

Based on the results of the NRC inspection conducted on November 28 - December 2, 1977, certain of your activities appear to deviate for your commitments to the Commission.

FSAR Table 6.2-5 states that the boron injection tanks are constructed of austenitic stainless steel.

Contrary to these specifications the boron injection tanks at Turkey Point Units 3 and 4 are constructed of carbon steel lined internally by 5/32 inch stainless steel.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
230 PEACHTREE STREET, N.W. SUITE 1217
ATLANTA, GEORGIA 30303

Report Nos.: 50-250/77-28 and 50-251/77-28

Docket Nos.: 50-250 and 50-251

License Nos.: DPR-31 and DPR-41

Licensee: Florida Power and Light Company
P. O. Box 013100
9250 West Flagler Street
Miami, Florida 33101

Facility Name: Turkey Point Units 3 and 4

Inspection at: Turkey Point Site, Florida City, Florida

Inspection conducted: November 28 - December 2, 1977

Inspector: M. V. Sinkule

Reviewed by: R. C. Lewis

R. C. Lewis, Chief

Reactor Projects Section No. 2

Reactor Operations and Nuclear Support Branch

12/20/77
Date

Inspection Summary

Inspection on November 28-December 2, 1977 (Report No.
50-250/77-28 and 50-251/77-28)

Areas Inspected: Routine, unannounced inspection of plant operations; preparation for refueling; Technical Specification requirements; unresolved items; and reportable events. The inspection involved 36 inspector hours on site by one NRC inspector.

Results: In the five areas inspected, no items of noncompliance or deviations were identified in four areas. One apparent deviation was identified in one area involving the boron injection tanks not being constructed of material specified in the FSAR (paragraph 6) (77-28-01).

DETAILS I

Prepared by: M. V. Sinkule
M. V. Sinkule, Reactor Inspector
Reactor Projects Section No. 2
Reactor Operations and Nuclear
Support Branch

12/20/77
Date

Dates of Inspection: November 28 -
December 2, 1977

Reviewed by: R. C. Lewis
R. C. Lewis, Chief
Reactor Projects Section No. 2
Reactor Operations and Nuclear
Support Branch

12/20/77
Date

All items pertain to both Turkey Point 3 and 4 unless otherwise specifically designated.

1. Persons Contacted

- *H. E. Yaeger, Plant Manager
- *J. K. Hays, Plant Superintendent, Nuclear
- *J. E. Moore, Superintendent, Nuclear Operations
- *D. W. Jones, QC Supervisor
- J. P. Mendieta, I and C Supervisor
- J. S. Wade, Chemistry Supervisor
- *R. J. Spooner, QA Supervisor
- *A. E. Siebe, Assistant Manager of QA, Operations
- *W. B. Wager, Operations Supervisor, Nuclear
- *T. A. Finn, Plant Supervisor, Nuclear
- *C. J. Baker, Plant Supervisor, Nuclear
- *K. E. Beatty, Training Supervisor
- *J. Hardy, Plant Engineer
- *P. J. White, Plant Superintendent, Maintenance
- *R. J. Acosta, Power Resources Specialist (GO)
- *R. Li, Power Resources Engineer (GO)
- *N. Ranek, Nuclear Licensing Engineer (GO)
- Two (2) Control Center Operators

The inspector contacted several operators and technical support personnel not specifically listed.

*Denotes those attending the exit interview on December 2, 1977.

2. Licensee Action on Previous Inspection Findings

Unresolved Items

(Open) (77-26-01, Inspection of Boron Injection Tanks)

Inspections of boron injection tanks (BIT) were initiated as a result of a thermowell failure at another facility. The licensee committed to visually inspecting Unit 3 BIT internals and conducting radiography of the thermowell connectors of both Unit 3 and Unit 4 BIT's. (paragraph 6)

3. New Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. An unresolved item disclosed in this inspection is discussed in Paragraph 10.b.

4. Exit Interview

The results of the inspection were discussed with H. E. Yaeger, Plant Manager, and members of his staff (denoted in paragraph 1) on December 2, 1977.

5. Entrance Interview and Plant Status

The inspector conducted an interview with plant management on November 28, 1977, and plant status, status of outstanding items and operating problems were discussed. Unit 3 had been shutdown on November 24, 1977, as scheduled for the purposes of refueling, inservice inspections, and maintenance. The outage is expected to last fifty-eight (58) days. Unit 4 operated at full power during the inspection except for reduced power operation on December 1, 1977, to repair a condenser tube leak. The plant manager stated that no exposures in excess of the Regulatory requirements had been received by personnel at the facility. No items of noncompliance were identified.

6. Boron Injection Tank Inspections

IE Report 50-250/77-26 and 50-251/77-26 identified an unresolved item concerning inspections of the Units 3 and 4 boron injection tanks and thermowells. The inspector reviewed FPL and Westinghouse visual inspection reports which indicated that the Unit 4 tank was satisfactory. The licensee stated during the exit interview that the visual inspections will be performed on Unit 3 during this refueling outage and that the thermowell connectors on both units will be radiographed to insure integrity. Unit 3 will be accomplished this outage and Unit 4 will be performed during the next extended outage. This item will remain unresolved pending completion of these inspections (77-26-01).

A review of the FSAR Table 6.2-5 indicates that the boron injection tanks are constructed of austenitic stainless steel when in fact the tanks are constructed of carbon steel lined with 5/32 inch stainless steel. Therefore, it appears that the construction of the tank is in deviation with the FSAR (77-28-01). In addition, a review of the Technical Specifications indicates that no requirements have been established for periodic inspections of these tanks.

7. Plant Operations

a. Letters of Instruction

The inspector reviewed operating memorandum and letters of instructions pertaining to plant operations to determine whether the instructions were in conformance with the Technical Specifications and regulatory requirements. No items of noncompliance were identified; however, the inspector commented during the exit interview that the letters of instructions appear to be outdated, in that some of these items have been included in operating procedures. Licensee representatives stated that Administrative Procedure, 0109.1, dated August 31, 1977, has been revised concerning the issuance of letters of instruction and that responsibility has been assigned to review the outstanding letters to determine applicability. The inspector verified that this item had been placed on the FPL outstanding items list and had no further questions.

b. Reporting Requirements

The inspector reviewed the plant supervisor's logs for October 1977, to determine whether reporting requirements specified in Technical Specification 6.9.2 have been met. No items of noncompliance were identified.

8. Preparation for Refueling (Unit 3)

The inspector reviewed operating procedures to verify that approved procedures were available for new fuel receipt and inspection; fuel transfer and core verification; recycled fuel inspections; fuel shipping operations; and core and fuel bundle reconstitution. The details associated with the review are described below:

a. New Fuel Receipt and Inspection

Operating Procedure 16009.2, "Site Removal of New Fuel Assemblies from Shipping Containers and Handling of Shipping Containers," was reviewed to verify that provisions have been provided for

the inspection of new fuel assemblies. Forty (40) new assemblies had been received on site and discussions indicated that ten (10) assemblies had been inspected and no problems had been identified. A review of two inspection reports which contained inspection results for four assemblies, dated November 16, 1977, did not identify any discrepancies.

b. Recycled Fuel Inspections

The licensee representatives stated that no plans are currently being made by FPL to conduct complete visual inspections of recycled fuel assemblies. This decision is based on the fact that the primary system activities have been relatively low during the preceeding cycle. The inspector reviewed a sample of E determinations for October 1977, which indicates that primary system activity was approximately 1-2 percent of that allowed by the Technical Specifications.

No plans were being made for fuel sipping operations for the same reason. Licensee representatives stated that Westinghouse was planning on conducting a video tape inspection of sixteen (16) of the assemblies removed during this cycle. No items of noncompliance were identified.

c. Fuel Transfer and Core Verification

The inspector reviewed:

- (1) Operating Procedure 1407.21, "Refueling Activities Check List"
- (2) "Refueling Limiting Conditions for Operation Check List"
- (3) Operating Procedure 16002.6, "Preparations and Precautions for Refueling Fuel Shuffle".

to ascertain that provisions have been established to ensure that the requirements of the Technical Specifications are met during the refueling process. No items of noncompliance were identified.

The licensee had not completed approval of Operating Procedure 16002.5 "Refueling Core Shuffle". This procedure is scheduled to be approved prior to the refueling operations which are currently scheduled to begin December 20, 1977. This item will be reviewed during a future inspection (77-28-03):

9. Limiting Conditions for Operation, Safety Limits, and
Limiting Safety System Settings

The inspector reviewed operating records, surveillance records, and performed visual observations and discussions with licensee personnel to ascertain compliance with or that procedures require adherence to various Technical Specification requirements as described below:

a. Reactivity Control Systems

Operating Procedures (OP) 1008.6, "Operation Outside of the Axial Flux Target Band"; and OP 12308.2, "Power Range Nuclear Instrumentation - Verification of Upper, Lower, and Channel Deviation Alarms" were reviewed to determine that procedures provide for the detection of axial and radial tilts. The inspector verified that the conditions of Technical Specifications 3.2.6.c, d, e, f, g, h, i were being met on Unit 4 on November 29, 1977, by visual observation of recording instrumentation, target value determinations, data sheets, and completed OP 12308.2. No items of noncompliance were identified.

b. Reactor Coolant System

The inspector verified that the conditions of Technical Specifications 2.1.2, 2.1.4, 2.2 and 2.3 were being met by review of the following records and by visual observation on November 29, 1977.

- (1) OP 1207.1, "Pressurizer Safety Valve Repair and Setting";
Unit 3 - December 6, 1976; Unit 4 - June 3, 1977.
- (2) OP 14007.14, "Pressurizer Pressure Instrumentation Calibration";
Unit 3 - November 23, 1976; Unit 4 - June 8, 1977.
- (3) OP 202.1, "Reactor Startup, Cold Shutdown to Power Operation"

No items of noncompliance were identified.

c. Plant and Electrical Power Systems

The inspector verified that the conditions of Technical Specifications 3.7.1.a, b, and e were being met by visual observation of the 480 and 4160 volt switchgear panels on November 29, 1977, and by review of minimum equipment lists for October 1977. No items of noncompliance were identified.

d. Emergency Core Cooling Systems

The inspector verified that the conditions of Technical Specification 3.4.1.a.3, 7 were met by visual observation of Unit 4 instrumentation on November 29, 1977, and by review of the following records:

- (1) OP 14007.25, "Accumulator Pressure Instrumentation Calibration," dated June 6, 1977, Unit 4.
- (2) OP 14007.24, "Accumulator Level Instrumentation Calibration," dated May 9, 1977, Unit 4.
- (3) OP 103.5, "Locked Valve List"; Unit 3, October 23, 1977; Unit 4, November 29, 1977.
- (4) Sample of Nuclear Control Center Operators data sheets for October 1977, Units 3 and 4.

No items of noncompliance were identified.

e. Containment Systems

- (1) The inspector verified that the conditions of Technical Specification 3.3.1 were being met by discussions with licensee personnel and review of the following documentation:
 - (a) OP 13531.1, "Leak Test of Equipment Hatch"; Unit 3 - January 13, 1977; Unit 4 - November 9, 1977.
 - (b) OP 13514.1, "Leak Test of Personnel and Emergency Access Hatches"; Unit 3 - July 27, 1977; Unit 4 - July 26, 1977.
 - (c) OP 16004.1, "Leak Test of the Fuel Transfer Tube"; Unit 3, January 12, 1977; Unit 4, July 22, 1977.
 - (d) OP 103.5, "Locked Valve List"; Unit 3, October 22, 1977; Unit 4, November 29, 1977.
- (2) The inspector verified that conditions of Technical Specification 3.4.3.a were being met by visual observation and review of the following records:
 - (a) Minimum Equipment Lists for October 1977. Units 3, 4.
 - (b) OP 4704.1, "Operability Test of the Emergency Containment Filter System", dated November 7, 1977. Unit 3.

No items of noncompliance were identified.

f. Instrument Systems

The inspector verified that the conditions of Technical Specification Table 3.5-1 Items 2,5,6,7,8 were being met by visual observation on November 29, 1977, of Unit 4 and a review of a sample of the minimum instrumentation lists for October 1977. No items of noncompliance were identified.

10. Reportable Events

The inspector reviewed two reportable events to ascertain that: (1) reporting requirements of Technical Specification 6.9.2 were met; (2) corrective action was taken as required by Appendix B to 10 CFR 50; (3) the event was reviewed and evaluated; and (4) the facility was operated within the requirements of 10 CFR 50.59 and the Technical Specifications subsequent to the event.

a. Reportable Event 251/77-10 (Unit 4)

This event involved the inoperability of a component cooling system heat exchanger which had been taken out of service for maintenance for 28 minutes longer than the time allowed by Technical Specification 3.4.4.b.2. The inspector conducted interviews with licensee personnel and reviewed the following records:

- (1) Plant Nuclear Safety Committee minutes dated October 14, 1977.
- (2) Plant Work Order dated September 26, 1977.
- (3) Plant Supervisors Log, Nuclear Control Center Log and Equipment Status Log for October 1, 1977.

The event was not reported to Region II within the 24 hours as required; however, licensee identified this fact and took appropriate corrective action. The inspector discussed the reporting requirements with licensee personnel and had no further questions.

b. Reportable Event 251/77-12 (Unit 4)

This event involved the blockage of the boric acid flow path between the boric acid tanks and the reactor coolant system on October 24, 1977. The inspector interviewed licensee personnel and reviewed operating records as follows:

- (1) Plant Supervisors Log, Nuclear Control Center Operators Log, and the Nuclear Operators Log for October 24, 1977.
- (2) Plant Nuclear Safety Committee Minutes - Date not recorded.
- (3) Pressurizer Pressure Recorder Chart for October 24, 1977.
- (4) Reactor Power Chart for October 24, 1977.
- (5) Plant Work Order dated October 24, 1977.

The inspectors review of the event indicated that: (1) operating records and the event evaluation did not contain all of the information which preceded identification of the event; and (2) the emergency borate line was not tested for approximately twelve (12) hours after it was determined that a boric acid flow path was not available through the blender. Discussions with licensee personnel indicated that they were aware of the slow identification of the blockage because of a failure of heat tracing circuit in another part of the system. Licensee representatives also acknowledged that it would have been prudent to test the emergency borate sooner than they did. Licensee representatives confirmed that their review of the event had come up with the same conclusions and that a meeting was held with the personnel involved to ensure that similar situations would be identified in a more timely manner in the future. During the exit interview the licensee committed to (1) reviewing the operating record which led up to this event and upgrading the records as appropriate, (2) reviewing the administrative procedures relative to licensee events and making appropriate changes to ensure that events are adequately identified, evaluated, corrected and documented. This item is unresolved (77-28-02).

c. Reportable Events 251/77-11 and 251/77-13 (Unit 4)

The inspector performed an in-office review of the two subject reportable occurrences and has no further questions.

d. Reportable Occurrence Report 251/76-06

The subject reportable occurrence report, which involved failure of a 4160 volt breaker, stated that a supplemental report will be issued concerning the results of a breaker reliability study and the recommended corrective actions. The licensee stated during the exit interview that the supplemental report will be submitted by December 30, 1977.

11. Containment Emergency Filter System (CEFS) (Unit 3)

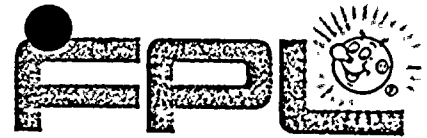
RII Inspection Report 50-250/77-26 identified an outstanding item concerning the testing of absorber spray valves on November 7, 1977. This item was discussed with FPL personnel who stated that testing of the valves was inadvertently added to the monthly operability tests of the CEFS during recent procedure revisions to OP 4701.1 to include the requirements of 10 CFR 50.55(a)(g). A review of the Technical Specifications indicate that there are no requirements to test the valves and review of the 10 CFR 50.55(a)(g) program submitted to the NRC indicate that an exception has been requested for not testing the valves on the basis that the valves are not designed to be tested. Valve actuation is not possible unless pressure is present on the valve to supply the driving force required to open or close the valve. The inspector had no further questions concerning this matter at this time.

12. Metal Impact Monitoring System

FPL notified Region II by telephone on September 19, 1977, concerning a problem with the Unit 4 metal impact monitoring system as required by The Order for Modification of License dated August 2, 1977. A written report concerning the event was submitted to the NRC on September 30, 1977. The inspector reviewed the corrective action prescribed in the letter by visual observation of the recording equipment in the control room and review of Operating Procedure 1003.2 dated November 6, 1977, and has no further questions.

13. Plant Tour

The inspector conducted a tour of the control room on December 2, 1977. No items of noncompliance were identified.



FLORIDA POWER & LIGHT COMPANY

January 3, 1978

L-78-3

Central file

*50-250
251*

Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
230 Peachtree Street, N. W., Suite 1217
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII:EHV
50-250/77-27
50-251/77-27

Florida Power & Light Company has reviewed the subject inspection report. There is no proprietary information in the report.

Very truly yours,

Robert E. Uhrig

Robert E. Uhrig
Vice President

REU/MAS/lah

cc: Robert Lowenstein, Esquire

7



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
230 PEACHTREE STREET, N.W. SUITE 1217
ATLANTA, GEORGIA 30303
DEC 14 1977

In Reply Refer To:

RII:EHV

50-250/77-27

50-251/77-27

Florida Power and Light Company
Attn: Dr. R. E. Uhrig, Vice President
of Nuclear and General
Engineering
P. O. Box 013100
9250 West Flagler Street
Miami, Florida 33101

Gentlemen:

This refers to the inspection conducted by Mr. E. H. Verdery of this office on November 21-23, 1977, of activities authorized by NRC Operating License Nos. DPR-31 and DPR-41 for the Turkey Point Units 3 and 4 facilities, and to the discussion of our findings held with Mr. H. E. Yaeger at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Within the scope of this inspection, no items of noncompliance were disclosed.

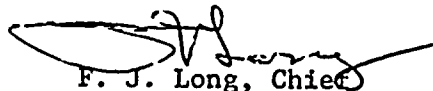
One new unresolved item resulted from this inspection and is discussed in the enclosed report. This item will be examined during subsequent inspections.

In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include a full statement of the reasons on the basis of which it is claimed that the information is proprietary, and should be prepared so that proprietary information identified in the application is contained

in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,



F. J. Long, Chief
Reactor Operations and
Nuclear Support Branch

Enclosure:

RII Inspection Report Nos.

50-250/77-27 and 50-251/77-27

cc w/encl: Mr. K. N. Harris, Plant Manager

St. Lucie Plant

P. O. Box 128

Ft. Pierce, Florida 33450

Mr. Nat Weems, Assistant QA Manager

P. O. Box 128

Ft. Pierce, Florida 33450



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
230 PEACHTREE STREET, N.W. SUITE 1217
ATLANTA, GEORGIA 30303

Report Nos.: 50-250/77-27 and 50-251/77-27

Docket Nos.: 50-250 and 50-251

License Nos.: DPR-31 and DPR-41

Licensee: Florida Power and Light Company
9250 West Flagler Street
P. O. Box 013100
Miami, Florida 33101

Facility Name: Turkey Point Units 3 and 4

Inspection at: Turkey Point Site, Homestead, Florida

Inspection conducted: November 21-23, 1977

Inspector: E. H. Verdery

Reviewed by: C. E. Alderson, Acting Chief
for Nuclear Support Section No. 2
Reactor Operations and Nuclear Support Branch

12/13/77
Date

Inspection Summary

Inspection on November 21-23, 1977: (Report Nos. 50-250/77-27 and 50-251/77-27)

Areas Inspected: Routine unannounced inspection of facility design changes and modifications on Unit Nos. 3 and 4. Specific areas examined included design change and modification evaluation procedures, implementation and acceptance tests; revisions to operating procedures; and maintenance of records. The inspection involved 20 inspector-hours on site by one NRC inspector.

Results: In the areas inspected, no items of noncompliance or deviations were identified.

DETAILS I

Prepared by:

E. H. Verdery
E. H. Verdery, Reactor Inspector
Nuclear Support Section No. 2
Reactor Operations and Nuclear
Support Branch

12/13/77
Date

Dates of Inspection: November 21-23, 1977

Reviewed by:

C. E. Alderson
for C. E. Alderson, Acting Chief
Nuclear Support Section No. 2
Reactor Operations and Nuclear
Support Branch

12/13/77
Date

1. Persons Contacted

Florida Power and Light Company

*H. E. Yaeger, Plant Manager
*D. W. Jones, Quality Assurance Supervisor
*J. E. Moore, Operations Supervisor
*P. J. White, Maintenance Supervisor
R. H. Reinhardt, Quality Control Engineer
L. C. Huenniger, Shift Supervisor

*Denotes those present at the exit interview.

2. Licensee Action on Previous Inspection Findings

Not inspected.

3. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance or deviations. An unresolved item disclosed during the inspection is discussed in paragraph 6.

4. Exit Interview

The inspection scope and findings were discussed with the licensee's representative listed in paragraph 1 at the conclusion of the inspection on November 23, 1977.

5. Design Changes and Modifications

The inspector reviewed nine completed modification packages. Of these, four were applicable to Unit No. 3, three were applicable to Unit No. 4 and two were applicable to both units.

During this review, the inspector verified that these design changes had been: reviewed in accordance with the licensee's approved quality assurance plan; evaluated in accordance with 10 CFR 50.59; conducted in accordance with the Technical Specifications and designated quality assurance procedures; implemented with formal approved procedures; and acceptance tested to demonstrate compliance with applicable Technical Specifications. Additionally, the inspector verified that appropriate operating procedures and system drawings had been revised for the selected design changes.

No items of noncompliance or deviations were identified.

6. Timeliness of Review of Documentation of Completed Modifications

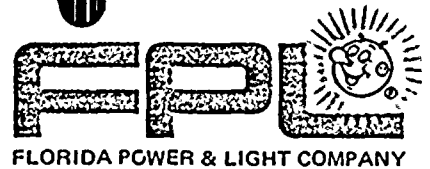
The inspector observed that the licensee has numerous modification packages outstanding for which the work has been accomplished but the documentation has not been reviewed. Some of these modifications had been completed for more than ten months. The licensee has revised AP0190.15, Plant Changes and Modifications (PC/M) as of February 28, 1977, but no PC/M's had as yet been completed using this new procedure. As revised, this procedure should provide more effective control of PC/M implementation, documentation and review; however, the continuing delays in review of supporting documentation may not be corrected by a new procedure alone.

Unresolved Item 77-27-01: The adequacy of the management controls for plant changes and modifications is designated an unresolved item pending further review.

7. Scope of Modification Implementation

The inspector noted that the licensee also has several incomplete PC/M's which have been outstanding for an excessive period of time. In many cases, some modification work is completed on one unit or system but the complete modification package cannot be closed because it was written to accomplish the same work on both units or several systems. The net result of this method of implementation is that some portion of a PC/M will remain outstanding indefinitely. Consequently, final review and approval of the PC/M is delayed

indefinitely after some safety-related components or systems have been modified. The inspector stated that the licensee should seriously consider reducing the scope of future PC/M's such that they can be accomplished, documented and reviewed on a shorter time schedule. This item has been identified in a previous inspection report (76-10).



December 21, 1977
L-77-389

Central File
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Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
230 Peachtree Street, N.W., Suite 1217
Atlanta, GA 30303

Dear Mr. O'Reilly:

Re: RII:MVS
50-250/77-26
50-251/77-26

Florida Power & Light Company has reviewed the subject inspection report. There is no proprietary information in the report.

Very truly yours,

Robert E. Uhrig
Vice President

REU/MAS/lah

cc: Robert Lowenstein, Esquire