

ATLANTA REGION
ATLANTA, GEORGIA

78 NOV 16 P 3: 56



November 14, 1978
L-78-359

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:AHJ

50-250/78-20
50-251/78-20

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
for
Robert E. Uhrig
Vice President

REU/MAS/dep

Attachment

cc: Robert Lowenstein, Esquire

7812120239#

ATTACHMENT

RE: RII: AHJ

50-250/78-20
50-251/78-20

Finding

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. Section 5.1 of ANSI 18.7 states in part that these policies (Administrative) shall assure that documents, including revisions or changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used by the personnel performing the prescribed activity.

Contrary to the above:

- a. On Unit 4, obsolete Maintenance Procedure 1207.1 (due to revision of July 18, 1978), Pressurized Safety Valve Repair and Setting, was used to perform maintenance as per Plant Work Order 2807 on August 15, 1978.
- b. On Unit 3 and 4, failure to revise obsolete surveillance checkoff lists to reflect current Technical Specifications, Section 3.13 and 4.14, Shock Suppressors.

Response

- a. The corrective action taken was to note the difference between the July 18, 1978 version of Maintenance Procedure 1207.1 and the version that was actually used to perform the work. The differences were then evaluated and determined to have no safety significance. This was accomplished while the inspector was still on site. In order to prevent recurrence, maintenance procedures in work packages made up prior to the outage in which the work is to be done will be reviewed and verified to be current when the packages are released to the field to be worked. This review process will begin no later than the first outage which begins after December 4, 1978. Full compliance will be achieved by December 4, 1978.

b. The corrective action taken was to revise Operating Procedure 16001.2, Technical Specification Surveillance Requirements for Core Refueling, to include the mechanical snubber inspection at each refueling and the hydraulic snubber functional test at each refueling in the procedure's checkoff lists. This was accomplished while the inspector was still on site. The surveillance checkoff lists will be revised to include the mechanical snubber inspection prior to the next refueling shutdown. Full compliance will be achieved by the beginning of the next refueling shutdown which is now scheduled to begin December 26, 1978. In order to prevent recurrence, the individuals responsible for reviewing new Technical Specification changes will be instructed in writing to perform the review thoroughly and carefully to ensure all aspects of compliance are considered.

