



L-79-8
January 10, 1979

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 :EHV
50-250/78-30
50-251/78-30

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/

Attachment

cc: Robert Lowenstein, Esquire

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ATTACHMENT

Re: RII:EHV
50-250/78-28
50-251/78-28

Finding

Technical Specification 6.8.1 requires, in part, that written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USNRC Regulatory Guide 1.33. Operating Procedure 2601.1, Boric Acid System Valve Alignment, specifies that Boric Acid Transfer Pumps 3A and 3B will be aligned to take a suction from the A Boric Acid Storage Tank and discharge through the Unit 3 Boric Acid Filter.

Contrary to the above, on December 5, 1978, the Boric Acid System was aligned with the 3B Boric Acid Transfer Pump to take suction on the C BAST and the 3A Boric Acid Transfer Pump was aligned for recirculation of the A BAST. This lineup precluded normal remote control of the Emergency Boration flowpath specified in Off-normal Operating Procedure 2608.1, Emergency Boration and no administrative controls were in effect to control this lineup.

Response

Corrective action to achieve compliance was accomplished on December 6, 1978 by the issuance of a Special Instruction regarding Boric Acid System lineups.

To prevent recurrence, Operating Procedure 2601.1 will be reviewed and revised as appropriate to provide additional controls in one or both of the following ways:

- 1) The addition of a requirement for the Nuclear Plant Supervisor to approve in advance any valve alignment that differs from the alignment in the procedure (for valves in the boric acid flow path to the reactor coolant system).
- 2) Expanding the scope of the procedure beyond "normal operation" by including "routine periodic evolutions" and their associated valve lineups, e.g., tank circulation lineup for sampling purposes.

PNSC review of the revised procedure has been planned for April 30, 1979.