

USNRC REC
ATLANTA, GA



FLORIDA POWER & LIGHT COMPANY

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September 28, 1979
L-79-276

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

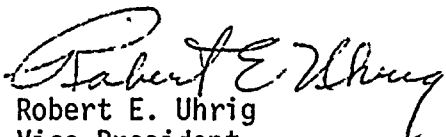
Dear Mr. O'Reilly:

Re: RII:RVL
50-250/79-26
50-251/79-26

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
Advanced Systems & Technology

REU/MAS/cph

Attachment

cc: Robert Lowenstein, Esquire

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PEOPLE ... SERVING PEOPLE



ATTACHMENT

Re: RII:RVL
50-250/79-26
50-251/79-26

Finding A

As required by Section 6.8.1 of the Technical Specifications, written procedures and administrative policies 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 shall be implemented.

Contrary to the above, the following two examples represent failure to implement existing procedures:

- 1) Replacement of the original controller for spray valve PCV-3-455 B with a different type controller which was in use during the inspection period was not performed under the guidelines of A.P. 190.15, "Plant Changes and Modifications".
- 2) No temporary procedure had been promulgated to insure consistent understanding between shifts of the operational control over the new spray valve controller as required by A.P. 109.6, "Temporary Procedures".

Response A

The use of a temporary spray valve controller had been reviewed by the PNSC on July 10, 1979. At that time the PNSC determined that no unreviewed safety question was involved, and the installation of the temporary controller was approved. The temporary controller was installed and calibrated under PWO 7989 (rather than under a PC/M or Special Test) on July 10, 1979, and operated satisfactorily. QC personnel noted on the PWO that the PNSC had reviewed the modification.

On August 10, 1979, the temporary controller was replaced with a modified controller under Special Test ST-79-12. The modified controller is presently installed in the system, and results have been satisfactory. In addition, personnel have been instructed on verbatim compliance with procedures to help ensure that applicable procedures are properly followed in the future.

Compliance has been achieved as of the date of this letter.



Finding B

As required by Section 6.9.2.b.3 of the Technical Specifications, observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems shall be reported to the NRC.

Contrary to the above, the lack of proper control and documentation of the bracket fabrication and installation process on the emergency diesel generator as discussed in the June 8, 1979, Plant Nuclear Safety Committee minutes was not reported to the NRC.

Response B

Our interpretation of the Technical Specifications had led us to conclude that we had adequately addressed the applicable reporting requirements. The basis for our conclusion was the documentation in Reportable Occurrence Report 250-79-20 on the diesel generator transformer failures, the PNSC review of the problems associated with the repair effort, the Nonconformance Report process, and the response to IE Inspection Report 79-24 (L-79-260).

Although we consider this to be an isolated case, we have instituted management action to ensure strict compliance with procedures, including prior review of safety related maintenance work plans by QC personnel.

As discussed in our response to IE Inspection Report 79-24, we are currently in compliance.

