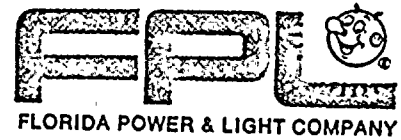


USNRC REGION II  
ATLANTA, GEORGIA



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July 29, 1980  
L-80-243

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  
50-250/80-21  
50-251/80-21

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: Harold F. Reis, Esquire

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OFFICIAL COPY



## ATTACHMENT

Re: RII:RVL  
50-250/80-21  
50-251/80-21

### 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 three examples represent a failure to implement existing procedures:

- (1) Main Steam Check Valve steam anti-rotation devices mislaid on the Unit 3 steam platform were not identified in QC steam platform housekeeping Inspection Reports dated October 25, 1979, March 28, 1980 and April 22, 1980 as required by procedure AP 0103.11, "Housekeeping".
- (2) The Supervisor on shift at the conclusion of the October 1979 maintenance of the Unit 3 Main Steam Check Valves (MSCV) failed to verify the proper dispositioning of the MSCV steam anti rotation devices remaining on the steam platform at the conclusion of the maintenance activity as required by AP 0103.11.
- (3) QC housekeeping inspection reports dated May 30, 1979, and October 25, 1979, were not documented on QC Inspection Report Form 5416 as required by AP 0103.11.

### Response A

With respect to the first example, housekeeping inspections conducted in accordance with Administrative Procedure 0103.11 are concerned with cleanliness, personnel safety, and fire prevention and protection (including disposal of combustible materials and debris). The procedure does not require QC inspectors to identify specific equipment or parts associated with work completed or in progress, or to identify other parts which may be located in the area. During the housekeeping inspections that were conducted in the area under consideration, the concern of the inspector was as set forth in Administrative Procedure 0103.11, i.e., for cleanliness, fire protection and prevention, and personnel safety. In response to the finding, QC inspectors will be instructed by copy of this letter to bring items that need further investigation to the attention of the responsible work area or work activity supervisor.

Full compliance will be achieved by August 15, 1980.



With respect to the second example, the anti-rotation devices were reinstalled on the check valve. Our investigation was unable to determine with certainty why the anti-rotation devices had not been reinstalled. To prevent recurrence, each supervisor in the Mechanical Maintenance Department will be instructed to supervise field work for which he is responsible to the extent that he can insure that the work is completed in the correct manner and the work area is restored to a satisfactory state as set forth in Administrative Procedure 0103.11.

Full compliance will be achieved by August 30, 1980.

With respect to the third example, a new QC inspector check off list was developed to be used in lieu of QC Inspection Report 5416. A procedural change has been made to Administrative Procedure 0103.11 to allow, at the discretion of the inspector, the use of either inspection report form to document housekeeping inspection results. This change had been made and reviewed by the Plant Nuclear Safety Committee prior to the exit interview.

Full compliance was achieved on June 6, 1980.



### Finding B

As required by Technical Specification 6.8.1, written procedures 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.

Contrary to the above, Maintenance Procedure 1507.8, "MSIV and MSCV Disassembly Repair and Reassembly" (dated 4/3/80) does not meet the requirements and recommendations of: (1) paragraph 5.3.5.2 of Section 5.3 of ANSI N18.7-1972 requiring procedures to contain enough detail to permit the maintenance work to be performed safely and expeditiously in that it contains no detail on the disassembly/reassembly of the MSCV operators; (2) paragraph 5.3.5.3 of Section 5.3 of ANSI N18.7-1972 requiring procedures to include, or reference, instructions for returning the equipment to its normal operating status in that such instructions are unavailable for the post maintenance check out of the MSCV's.

### Response B

As corrective action, Maintenance Procedure 1507.8 is being split into two distinct procedures, one on the MSIV's and the other on the MSCV's. The new MSCV procedure, which is now in the process of being written, will detail the MSCV disassembly, repair, and reassembly and will include the removal and reinstallation of the MSCV operators.

Full compliance will be achieved by August 31, 1980..



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