

NONRO REG. NO.
ATLANTA, GEORGIA

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April 17, 1981
L-81-171

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

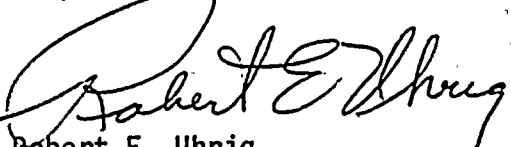
Dear Mr. O'Reilly:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
IE Inspection Report 81-05

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 and Technology

REU/PLP/mbd

Attachment

cc: Mr. Harold F. Reis, Esquire

8105150068



ATTACHMENT

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250, 50-251
IE Inspection Report 81-05

FINDING A:

As required by 10 CFR 50, Appendix B, Criterion XVI, and paragraph 16.1 of the accepted Quality Assurance Program, measures shall be established to assure that conditions adverse to quality such as nonconformances are promptly identified and corrected as soon as practicable. Administrative Procedure 0190.13, Corrective Actions for Conditions Adverse to Quality, implements these requirements.

Contrary to the above, measures established did not assure that conditions adverse to quality were corrected as soon as practicable in that:

1. An average of eight weeks was taken to make an initial acknowledgement of the QC deficiencies listed in Nonconformance Reports 80-49, 80-52 and 80-58, and in Quality Control surveillance RReports 80-148 and 80-281, thereby preempting correction of the deficiency as soon as practicable, and
2. Failure to pursue prompt corrective action with respect to the deficiencies listed in Quality Control Surveillance Reports QCSR 80-88, 80-148, 80-261, and 80-281 was evidenced by one ten month period of inactivity and three cases of repeated inability of responsible managers to provide corrective action status.

RESPONSE A:

(A-1) FPL concurs with the finding.

(A-2) The reason for the finding is that some quality control findings were not given sufficiently high priority by some plant personnel.

(A-4) As corrective action to avoid further problems, the notice letter which is now currently used to notify individuals responsible for corrective action will be revised to inform these parties that a written response must be received within 10 working days. If the response is not received within this 10 day period, a follow-up notice will be sent informing the individual that a written response must be initiated within seven additional working days or the item will be forwarded to the Plant Manager - Nuclear for immediate action.

(A-5) Full compliance will be achieved by June 1, 1981.

FINDING B:

Technical Specification 6.9.2.b(2) requires a 30 day written report be submitted to the Nuclear Regulatory Commission when a parameter enters an action mode described in the related Limiting Condition for Operation.



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Contrary to the above, a 30 day written report was not submitted to the Nuclear Regulatory Commission when Unit 3 Reactor Coolant System chloride concentration exceeded 0.15 ppm, the limit specified by Limiting Condition for Operation 3.1.5.d. The action required by Technical Specification 3.1.5 was performed.

RESPONSE B:

- (B-1) FPL concurs with the finding.
- (B-2) The reason for the finding is the misinterpretation of the Technical Specification reporting requirement.
- (B-3) As corrective action, a 30 day report has been prepared that addresses this issue.
- (B-4) As corrective action to avoid further problems, we will take into account the interpretation of Regulatory Guide 1.16 quoted in the inspection report in determining the reportability of an item.
- (B-5) Full compliance will be achieved by April 23, 1981.

FINDING C

Technical Specification 6.8.1 requires that written procedures shall be established and implemented. Operating Procedure 4303.1, Emergency Diesel Generator normal Standby Condition, specifies in Section 8.2.7 that the backup air system reservoir outlet valves be closed for Diesel Generator A and B.

Contrary to the above, the starting backup air system reservoir outlet valves (ED 108 and ED 208) for Diesel Generators A and B, were found to be in an open position instead of a closed position. The diesel generators remained operable during the above event.

RESPONSE C:

- (C-1) FPL concurs with the finding.
- (C-2) The reason for the finding is that the posted air starting system diagrams were not consistent with Operating Procedure 4303.1.
- (C-3) As corrective action, the diagrams were revised in the Emergency Diesel Generator Rooms to be consistent with Operating Procedure 4303.1 and valves ED 108 and ED 208 were closed.
- (C-4) As corrective action to avoid further problems, the operators were counseled to use procedures in the performance of their duties.
- (C-5) Full compliance was achieved on March 1, 1981.

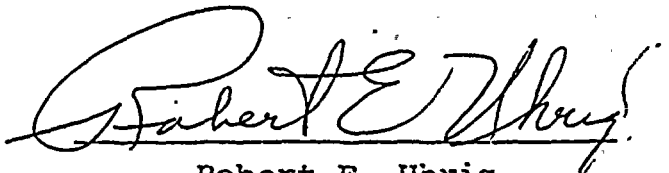


STATE OF FLORIDA)
)
COUNTY OF DADE) SS.

Robert E. Uhrig, being first duly sworn, deposes and says:

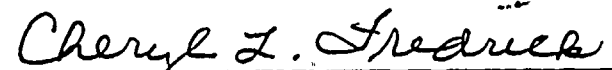
That he is a Vice President of Florida Power & Light Company,
the Licensee herein;

That he has executed the foregoing document; that the state-
ments made in this said document are true and correct to the
best of his knowledge, information, and belief, and that he
is authorized to execute the document on behalf of said
Licensee.


Robert E. Uhrig

Subscribed and sworn to before me this

17 day of April, 1981


NOTARY PUBLIC, in and for the county of Dade,
State of Florida

My commission expires: Notary Public, State of Florida at Large
My Commission Expires October 30, 1983
~~Sended thru Maynard Bonding Agency~~