

June 15, 1981
L-81-250

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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 & 50-251
IE Inspection Report 81-09

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/PLP/ras

cc: Harold F. Reis, Esquire

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ATTACHMENT

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
IE Inspection Report 81-09

FINDING:

- A. 10 CFR 50.59(b) requires the licensee to maintain records of tests and experiments and these records shall include a written safety evaluation which provides the bases for the determination that the test or experiment does not involve an unreviewed safety question.

Contrary to the above, safety evaluations for test numbers 79-03, 79-15, 80-01, 80-04, 80-07 and 80-08 were not performed.

RESPONSE:

- (A-1) FPL concurs with the finding.
- (A-2) The reason for the finding was failure to follow the administrative procedure for processing special tests.
- (A-3) As corrective action, safety evaluations were written for the special tests and were given to the inspector at the exit interview.
- (A-4) As corrective action in order to avoid future problems, we will issue a letter to plant departments, emphasizing the proper review channels which must be adhered to for special tests. Tentative plans are also in the discussion stage concerning the possibility of developing a check off sheet for special tests which would insure that processing would be conducted in a systematic method.
- (A-5) Full compliance will be achieved by June 30, 1981.

FINDING:

- B. 10 CFR 50, Appendix B criterion V and the accepted Quality Assurance (QA) Program Technical Quality Requirement 5.0 require that activities affecting quality be prescribed by documented procedures and shall be accomplished in accordance with these procedures. Procedure QP 17,1. The Collection and Storage of Quality Assurance Records for Nuclear Power Plants, Revision 6 dated October 1980, requires that a log of QA records be included in the receipt control system and states that maintenance of QA records transmittals is an acceptable log.

Contrary to the above, a log or transmittal maintenance system is not in use for quality identified recorder charts received at the site document control center.

RESPONSE:

- (B-1) FPL concurs with the finding.
- (B-2) The reason for the finding was that we did not interpret the requirement for record transmittals to apply to recorder charts.
- (B-3) As corrective action, a receipt control process has been established for all recorder charts that are transmitted to the site document control center.
- (B-4) As corrective action in order to avoid further problems, this process has become a permanent policy for document control
- (B-5) Full compliance was achieved on May 15, 1981.

FINDING:

- C. 10 CFR 50, Appendix B Criterion V and the accepted QA Program Technical Quality Requirement 5.0 require that activities affecting quality be prescribed by documented procedures and shall be accomplished in accordance with these procedures. Procedure AP 0190.14, Document Control and Quality Assurance Records, dated August 1980, requires that record custodians shall keep records cabinets locked when not in use.

Contrary to the above, on April 8, 1981, the Health Physics (HP) quality records cabinet in the HP trailer was observed open and unattended with the trailer unlocked.

RESPONSE:

- (C-1) FPL concurs with the finding.
- (C-2) The whole body count trailer was in the process of being relocated when the record cabinet was discovered unlocked and unattended. It was an inadvertent oversight in the rush of making preparations to move the trailer which resulted in the cabinet not being closed and locked when the trailer personnel exited the trailer for it to be moved.
- (C-3) As corrective action, upon discovery of the unlocked cabinet by the inspector, the cabinet was immediately locked..
- (C-4) As corrective action in order to avoid further problems, Health Physics administrative personnel were re-instructed in the procedural requirements for the records cabinet.
- (C-5) Full compliance was achieved on April 18, 1981.



FINDING:

- D. 10 CFR 50, Appendix B Criterion V and the accepted QA Program Technical Quality Requirement 5.0 require that activities affecting quality be prescribed by documented procedures and shall be accomplished in accordance with these procedures. Procedure AP 0190.72, Receipt Inspection, Identification and Control of Nuclear Safety Related and Fire Protection Parts, Materials and Components, dated August 1980, requires that Quality Control (QC) inspection tags (denoting material acceptance) will remain attached to the control material until installation in the plant system.

Contrary to the above, several "QC required" items including Asco Valves and Namco Switches were observed in the Instrumentation and Control Section material control cabinet without the required QC tags.

RESPONSE:

- (D-1) FPL concurs with the finding.
- (D-2) Investigation into the reason that these tags were not attached to the items did not reveal why they had been removed. It was established that the tags had been placed on these items as required by our procedure requirements. The most likely reason for the missing tags was a misunderstanding of the tag removal requirements by I&C personnel.
- (D-3) As corrective action, our QC Department was notified of the problem. QC personnel immediately reconfirmed that the proper documentation requirements had been fulfilled and then placed new tags on the item's which were "QC required" material.
- (D-4) As corrective action in order to avoid further problems, I&C Department supervision was notified of the problem and personnel within the I&C Department were counseled on the proper procedural requirements.
- (D-5) Full compliance was achieved April 30, 1981.

FINDING:

- E. In response to Item A.3 in the Notice of Violation transmitted by the Region II letter dated June 20, 1979, FP&L correspondence dated July 12, 1979, listed the following long term corrective action involving rigging and hoisting equipment:

- (1) The submittal of an exception to the FPL Topical Quality Assurance Report by June 20, 1979 to describe this program.
- (2) Inclusion of this program into Corporate Quality Procedures and Turkey Point Administrative Procedures within 30 days after approval of the Topical Quality Assurance Report revision.



11-11-61



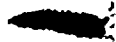
- (3) Full compliance will be achieved upon revision of these procedures.

Revision 3 to the FPL Topical QA Report was submitted as required by item (1). FPL stated during the inspection that full implementation had been achieved on September 1980 as intended by items (2) and (3).

Contrary to the above, inclusion of this program relative to the exception involving rigging and hoisting equipment into Corporate Quality Procedures and Turkey Point Administrative Procedures had not been accomplished as of the date of this inspection.

RESPONSE:

- (E-1) FPL concurs with the finding.
- (E-2) Topical Quality Assurance Report Revision 3 addressed an inspection program which complied with certain sections of ANSI 45.2.2 concerning rigging and handling equipment. A draft revision to Quality Procedure 13.2 was prepared to reflect these changes. The draft Quality Procedure was presented to our review committee for approval but was tabled for additional work. Inadvertently, the procedure was not reworked due to administrative oversight. In the meantime, the NRC issued NUREG 0612, Control of Heavy Loads. Upon review of the NUREG it was realized that the ANSI N45.2.2 program requirement and the NUREG-0612 program requirements are very closely related and that our FPL program should address the requirements of both of these documents. Therefore, our commitment date to implement these changes must be delayed.
- (E-3) As corrective action, we have begun our studies and evaluations as requested by the NRC letter dated December 22, 1980 which accompanied NUREG-0612. The revised QP 13.2 was approved by our review committee on June 11, 1981 and it is scheduled to be issued by July 31, 1981.
- (E-4) As corrective action in order to avoid further problems, NUREG-0612, Control of Heavy Loads, is in the process of being addressed by FPL. The requirements which we intend to meet through NUREG-0612 will accomplish in the long term, the ultimate goal of establishing a standard rigging and hoisting inspection and use program. We will also take the necessary actions to comply with our revised QP 13.2.
- (E-5) Full compliance will be achieved by October 22, 1981, which is the date we have scheduled for the submittal of our final response to NUREG 0612



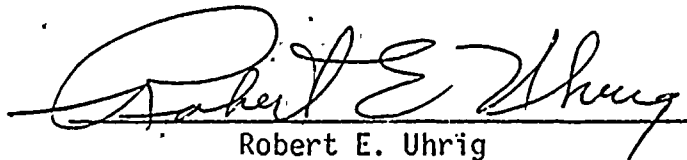
STATE OF FLORIDA)
)
COUNTY OF DADE)

ss. .

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

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

That he has executed the foregoing document; that the statements 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

15 day of June , 19 81

Cheryl I. Fredrick
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
Bonded thru Maynard Bonding Agency

