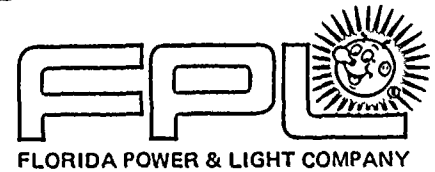


USNRC REGION II  
ATLANTA, GEORGIA

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June 30, 1981  
L-81-272

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 81-11

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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PDR ADDCK 05000250  
Q PDR



Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250, 50-251  
IE Inspection Report 81-11

FINDING A:

Technical Specification Section 4.15.2.a.3 requires that each valve in the flow path of the fire protection water system be demonstrated operable monthly by verifying that the valve is in the correct position. Technical Specification Section 4.15.3.a.1 requires the fire hose stations in the vicinity of safety related equipment to be demonstrated operable monthly by visual inspection of the hose station equipment. Technical Specification Section 4.0.1 permits the inspection frequency to vary by plus or minus 25% and Table 4.1-2 stipulates a maximum interval of 45 days between the monthly fire protection system surveillances.

Contrary to the above, the interval between the November 21, 1980 and the January 9, 1981 surveillance inspection and test of the fire protection water system control valves and the fire hose stations was 48 days.

RESPONSE:

- (A-1) FPL concurs with the finding.
- (A-2) During the month of December of each year, both the annual and the normal monthly fire hose and fire valve inspections are conducted. These inspections are held concurrently. Although the annual inspection was completed within the allowed time period, due to a misunderstanding, the testing completion date inadvertently extended past the allowable interval for the monthly tests. Both the annual and monthly inspections were satisfactorily completed.
- (A-3) As corrective action, Maintenance Procedure 15537.2, Fire Protection Equipment - Periodic Surveillance, was reviewed to evaluate changes which could be made to avoid this problem.
- (A-4) As corrective action in order to avoid further problems, Maintenance Procedure 15537.2, Fire Protection Equipment - Periodic Surveillance, will be revised to document the date when the monthly inspections are completed and the date when the annual inspections are concluded. This will resolve any question with respect to exact inspection completion dates.
- (A-5) Full compliance will be achieved by July 31, 1981.

FINDING B:

License Condition paragraph 2.(g) for Unit 3 requires the fire protection modifications identified in paragraph 3.1.1 through 3.1.19 of the NRC's Fire Protection Safety Evaluation Report (FPSEER) dated March 21, 1979 to be completed prior to December 1980 unless a request for a revised schedule was submitted.

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Contrary to the above, the fire damper in the side wall vent opening of the Unit 3 south electrical penetration room required by paragraph 3.1.10 of the FPSEER had been installed but was not operational due to the installation of a 3/8 inch pipe (tube) through the vent opening. This pipe would have prevented the damper from closing in the event of a fire.

RESPONSE:

- (B-1) FPL concurs with the finding.
- (B-2) We investigated the situation but were unable to determine who installed the tubing.
- (B-3) As corrective action, the tubing was removed and rerouted.
- (B-4) As corrective action in order to avoid further problems, a letter will be issued by appropriate plant management to all personnel at the plant stating that all fire protection closable fire barriers shall not be made inoperable.
- (B-5) Full compliance will be achieved by July 31, 1981.

FINDING C:

License Condition paragraph 2.(g) for Unit 3 and paragraph 2.(f) for Unit 4 require the licensee to develop and implement administrative controls which are consistent with the licensee's letters of August 28 and November 7, 1978 within three months from March 21, 1979. The licensee's letter of August 28, 1978 stated that the stockpile of wood for use in the plant was being converted to one treated with a flame retardant.

Contrary to the above, the licensee has not developed and implemented procedures to convert the wood used in the plant to fire retardant treated wood. A total of 300 wood scaffolding planks (2" X 12" X 16') which are not treated with a fire retardant were recently delivered to the plant (Purchase Order RPA 163487 dated November 17, 1980).

RESPONSE:

- (C-1) FPL concurs with the finding.
- (C-2) The reason for the finding was an administrative oversight. A procedure revision was prepared to address the commitments of the August 28, 1978 letter, but this change was not approved because revisions to the draft change were seen to be necessary by plant personnel. The processing of the procedure change was then mistakenly not carried to completion.



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- (C-3) As corrective action, we evaluated the 300 scaffolding planks noted in the finding. It was determined that although the 300 plank order did not specify fire retardant treatment, the planks did receive a water adhesive treatment. It has been learned from the supplier that the treatment for water adhesive application also increases the fire retardant properties of the wood. The vendor has informed us that these treated planks have a flame spread value of 35. Because of the relatively low flame spread value of these planks, we will use them where flame retardant wood is specified.
- (C-4) As corrective action in order to avoid further problems, extensive discussions are being held to ensure that we will develop a plant policy on control, procurement, and use of wood on site. Also, a new fire protection coordinator has been hired and it is anticipated that he will be able to assist us in implementing the new policy in a meaningful and workable manner.
- (C-5) Full compliance will be achieved by September 30, 1981.

FINDING:

FPL's Report "Fire Protection - A Reevaluation of Existing Plant Design Features and Administrative Controls" dated February 25, 1977, Table 9-1 (page 9-11) states that the fire detection system at Turkey Point complies with NFPA-72D, Proprietary Protective Signaling Systems. NFPA-72D Section 3-5.1.1 states that automatic fire detectors shall be location, maintained and tested in accordance with NFPA-72E, Automatic Fire Detectors. NFPA-72E Section 8-3.1.5 requires smoke detectors to be tested semiannually.

Contrary to the above, all of the fire detectors in safety related areas are not tested semi-annually. The licensee only tests the minimum number of detectors per zone that is required to be operational by the Technical Specifications.

RESPONSE:

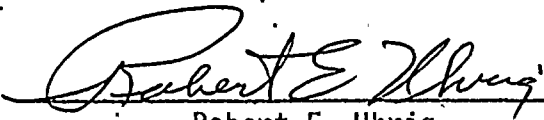
We have reviewed the applicable NFPA standards, our commitments in this area, and applicable Technical Specifications. Our 2/25/77 commitment that the fire detection system complies with NFPA-72D meant that the physical installation of the detection system met the design and construction features of the standards. There was no intention at that time to commit to any administrative controls related to the detectors. We meet our Technical Specification surveillance requirements by testing enough of the detectors to demonstrate a sufficient number of detectors are operable to meet the associated limiting condition for operation.

STATE OF FLORIDA     )  
                              )  
COUNTY OF DADE     )     ss.

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

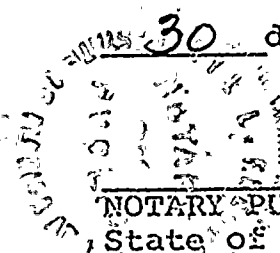
That he is                      Vice President                      of Florida Power & Light Company, the Licensee herein;

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

30 day of June, 19 81

 Cheryl L. Frederick  
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



