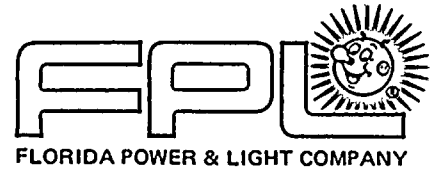


USNRC REGION II
ATLANTA, GEORGIA



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January 15, 1982
L-82-15

Mr. James P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: Turkey Points Units 3 & 4
Docket Nos. 50-250, 50-251
IE Inspection Report 81-28

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 81-28

FINDING:

Technical Specification 6.8.1 requires the licensee to establish and implement procedures that meet the requirements and recommendations of ANSI N18.7 - 1972 and Appendix "A" of Regulatory Guide 1.33.

Contrary to the above, while the reactor head was removed for refueling, the licensee did not implement two procedures in accordance with the requirements of ANSI N18.7 - 1972.

1. Operating Procedure 16200 requires items that could fall into the reactor to be kept off the manipulator crane and clear of the reactor cavity. On November 17, 1981, miscellaneous, untethered tools and materials were observed on the manipulator crane.
2. Quality Procedure 2.10 requires material accountability to be applied when misplaced items could be detrimental to the safety function of a system. On November 17, 1981, a system of material accountability had not been established for items entering the refueling area.

RESPONSE:

1. FPL concurs with the finding.
2. FPL did not previously interpret Quality Procedure 2.10 to require material accountability to be necessary in the refueling area.
3. The immediate problem was resolved when refueling was completed.
4. In order to prevent recurrence, FPL will implement a material accountability program as required by Quality Procedure 2.10.
5. Full compliance will be achieved prior to the post steam generator repair fuel loading on Unit 3. (Which is now scheduled for February 20, 1982).

FINDING:

Paragraph 14.2.1 of the Final Safety Analysis Report states that assumptions used for a fuel handling accident in the spent fuel pit are conservative because the auxiliary building doors are closed during movement of spent fuel.

Contrary to the above, during fuel handling operations on November 17, 1981, doors which lead from the spent fuel pit directly to the outside atmosphere were propped open.

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I.E. INSPECTION REPORT 81-28 (Continued)
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RESPONSE:

FPL will perform a safety evaluation of the spent fuel pit doors being open during movement of spent fuel. If the safety evaluation demonstrates that keeping the doors open during spent fuel movement does not involve any unreviewed safety questions, FPL will continue our current practice. If not, we will modify our current practice to remedy the unreviewed safety question. The doors will be closed while moving spent fuel into or out of containment pending completion of the safety evaluation.

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STATE OF FLORIDA)
COUNTY OF DADE)

Jack E. Vessely, being first duly sworn, deposes and says:

That he is Director of Nuclear Affairs of Florida Power &
Light Company, the 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

Jack E. Vessely 1/15/82
Jack E. Vessely

Subscribed and sworn to before me this

15 day of January, 1981

Cheryl L. 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

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