P.O. BOX 529100 MIAMI, FL 33152

FPL
FLORIDA POWER & LIGHT COMPANY

January 28, 1982
L-82-32

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 Point Units 3 & 4
Docket Nos. 50-250, 50-251
IE Inspection Report 80-38/37

Florida Power & Light responded to IE Inspection Report 80-38/37 in our letter (L-81-127) dated March 25, 1981. In that report, Finding A concerned the maintenance of training records for nuclear turbine operators. We responded that as future corrective action we would review existing non-licensed operator training procedures and make revisions as necessary. Our letter said that full compliance would be achieved by January 1, 1982.

The review of the non-licensed operator training program and procedures has been completed, but the procedure revision, although prepared in drait form has not received final review prior to being issued. The procedure revision, which is essentially an upgrade of the training program, has been substantially incorporated into the program. However, in order to be in full compliance, we have determined that the revised procedure should be reviewed, issued and fully implemented.

Our current plans are to complete the non-licensed operator training procedure revision and then to issue the procedure by February 26, 1982.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/cab

Attachment

cc: Harold F. Reis, Esquire

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

APR 0 9 1981

Florida Power and Light Company
ATTN: R. E. Uhrig, Vice President
Advanced Systems and
Technology
P. O. Box 529100
Miami, FL 33152

Gentlemen:

Subject: Inspection Report 50-250/80-38 and 50-251/80-37

Thank you for your letter of March 25, 1981, informing us of steps you have taken to correct the violations concerning activities under NRC License Nos. DPR-31 and DPR-41 brought to your attention in our letter of February 27, 1981. We will examine your corrective actions and plans during subsequent inspections.

We appreciate your cooperation with us.

Sincerely,

R. C. Lewis

R. C. Lewis, Acting Director
Division of Resident and Reactor
Project Inspection

cc: H. E. Yaeger, Plant Manager

March 25, 1981
L-81-127

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:
50-250/80-38
50-251/80-37

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/JEM/ras

Attachment

cc: Harold F. Reis, Esquire

DRAFT RESPONSE TO USNRC IE INSPECTION REPORT 80-38/80-37

Finding A:

Technical Specification 6.4.1 requires that a retraining and replacement training program for the facility staff be maintained under the direction of the training supervisor to meet or exceed the requirements and recommendations of Section 5.5, ANSI N18.1-1971. Section 5.5 of ANSI N18.1 1971 requires that a means be provided in the training programs for appropriate evaluation of its effectiveness.

Contrary to the above, the Training Supervisor failed to implement an existing administrative procedure on the training and retraining program of nuclear operators and nuclear turbine operators in that the nuclear turbine operator on-the-job (on-shift) training records for trainee evaluation purposes were not maintained as required by AP 0303.

Response A:

(A-1) FPL concurs with the finding.

(A-2) The reasons for the findings are:

(1) Turnover of nuclear turbine operators has been significant during this past year.

(2) The training staff had been undermanned to handle the amount of training necessitated by the turnover.

(A-3) As corrective action, the size of the training staff has been increased to properly support the effort required in the non-licensed operator area. The training program for nuclear turbine operators was reinitiated in January of this year and will continue in order to insure this training will be conducted as required by Administrative Procedure 0303, Nuclear Operator and Nuclear Turbine Operator Training and Retraining Program.

(A-4) As corrective action in order to avoid further problems, (1) Review of the existing non-licensed operator training procedures will be conducted and the procedures revised if necessary to more clearly define our policies on replacement training and retraining of non-licensed operators, and (2) the Quality Control Department will periodically check the progress of the non-licensed operator training program.

(A-5) Full compliance will be achieved by January 1, 1982.

Finding B:

Technical Sepcification 6.8.1 requires that written procedures and administrative policies be established, implemented, and maintained that meet or exceed the requirements of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USNRC Regulatory Guide 1.33.

Contrary to the above, the Nuclear Plant Supervisor failed to implement an existing administrative procedure on the control of valves, locks and switches in that on December 4, 1980, the onshift nuclear plant supervisor failed to enter into the locked valve deviation log of Administrative Procedure 0103.5 the change in status of valves MOV-3-863A and B, "RHR Heat Exchanger to RWST or Alternate LHSI" which had undergone a periodic valve exercise test in accordance with Operating Procedure 0209.1. Valves MOV-3-863A and B with their associated circuit breakers are included in the valve, lock and switch list of AP 0103.5 and the status of these valves is required to be under administrative control.

Response B:

(B-1) FPL concurs with the finding.

(B-2) The reason for the violation was that the Nuclear Plant Supervisor assumed that the requirement to log deviations of valve positions did not apply if the repositioning was covered by another procedure.

(B-3) As corrective action a procedure change that was reviewed and approved by the Plant Nuclear Safety Committee on March 19, 1981, to Administrative Procedure 0103.5 clarifies that when a deviation from normal line up occurs, it will be logged in the deviation log, unless it is covered by an approved plant procedure and/or equipment clearance order.

(B-4) As corrective action in order to avoid further problems, we will review our pump and valve test procedures to ensure that when these procedures cause a valve on the locked valve list to be operated they also require it to be returned to its normal position and relocked.

(B-5) Full compliance will be achieved by March 31, 1981.

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

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 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

25 day of March, 1981

Cheryl L. Fredrick

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

My commission expires: [illegible]

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

FEB 27 1981

Florida Power and Light Company
ATTN: R. E. Uhrig, Vice President
P. O. Box 529100
Miami, FL 33152

Gentlemen:

Subject: Report Nos. 50-250/80-38 and 50-251/80-37

This refers to the routine inspection conducted by A. J. Igantonis and W. C. Marsh of this office on December 1-31, 1980, of activities authorized by NRC Operating License Nos. DPR-31 and DPR-41 for the Turkey Point facility. Our preliminary findings were discussed with J. K. Hays at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

During the inspection, it was found that certain activities under your license appear to violate NRC requirements. These items and references to pertinent requirements are listed in the Notice of Violation enclosed herewith as Appendix A. Elements to be included in your response are delineated in Appendix A.

We have examined actions you have taken with regard to previously identified enforcement matters. These are discussed in the enclosed inspection report.

In accordance with Section 2.790 of the NRC "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC Public Document Room. If this report contains any information that you believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include the basis for claiming that the information is proprietary and the proprietary information should be contained in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

R.C. Lewis

R. C. Lewis, Acting Chief
Reactor Operations and Nuclear
Support Branch

Enclosures:
1. Appendix A, Notice of Violation
2. Inspection Report Nos. 50-250/80-38 and 50-251/80-37

cc w/encl:
H. E. Yaeger, Plant Manager

APPENDIX A

NOTICE OF VIOLATION

Florida Power and Light Company
Turkey Point Units 3 & 4

Docket Nos. 50-250 & 50-251
License Nos. DPR-31 & DPR-41

As a result of the inspection conducted on December 1-31, 1980, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

A. Technical Specification 6.4.1 requires that a retraining and replacement training program for the facility staff be maintained under the direction of the training supervisor to meet or exceed the requirements and recommendations of Section 5.5, ANSI N18.1-1971. Section 5.5 of ANSI N18.1 1971 requires that a means be provided in the training programs for appropriate evaluation of its effectiveness.

Contrary to the above, the Training Supervisor failed to implement an existing administrative procedure on the training and retraining program of nuclear operators and nuclear turbine operators in that the nuclear turbine operator on-the-job (on-shift) training records for trainee evaluation purposes were not maintained as required by A.P.0303.

This is a Severity Level V Violation (Supplement I.E.).

B. Technical Specification 6.8.1 requires that written procedures and administrative policies be established, implemented, and maintained that meet or exceed the requirements of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USNRC Regulatory Guide 1.33.

Contrary to the above, the Nuclear Plant Supervisors failed to implement an existing administrative procedure on the control of valves, locks and switches in that on December 4, 1980, the onshift nuclear plant supervisor failed to enter into the locked valve deviation log of administrative procedure 0103.5 the change in status of valves MOV-3-863A&B, "RHR Heat Exchanger to RWST or Alternate LHSI "which had undergone a periodic valve exercise test in accordance with operating procedure 02.09.1. Valves MOV-3-863A&B with their associated circuit breakers are included in the valve, lock and switch list of A.P.0103.5 and the status of these valves is required to be under administrative control.

This is a Severity Level VI Violation (Supplement I.F.) applicable to Unit 3 only.

Pursuant to the provisions of 10 CFR 2.201, Florida Power and Light Company is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if

admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Date: FEB 27 1981

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

Report Nos. 50-250/80-38 and 50-251/80-37

Licensee: Florida Power & Light Company
9250 West Flagler Street
Miami, FL 33101

Facility Name: Turkey Point

Docket Nos. 50-250 and 50-251

License Nos. DPR-31 and DPR-41

Inspection at Turkey Point site near Homestead, Florida

Inspector: M B Shamblott for — 2/27/81
A. J. Ignatonis — Date Signed

Accompanying Personnel: W. C. Marsh

Approved by: C. Julian — 2/27/81
C. Julian, Acting Section Chief, RONS Branch — Date Signed

SUMMARY

Inspection on December 1-31, 1980

Areas Inspected

This routine inspection involved 111 resident inspection hours on site. During this reporting period Unit 4 continued to be in a shutdown condition for the scheduled refueling outage which included time spent for the preparation of the periodic Integrated Leak Rate Testing, replacement of feedwater heaters and main steam reheater tube bundles, and other scheduled inspection and maintenance activities of primary system components. The areas of inspection were: (1) licensee event report followup; (2) followup of previous inspection findings; (3) surveillance test observations; (4) plant operations including the review of the Nuclear Turbine operator training program; (5) witness of Unit 4 pressurizer safety valve bench testing; and (6) plant tours.

Results

Of the six areas inspected, no items of noncompliance or deviations were identified in five areas; two aparent items of noncompliance were found in one area (Violation - failure to fully comply with paragraph 6.4.1 of the plant Technical Specifications - paragraph 8; violation - failure to follow administrative procedure - paragraph 8).

DETAILS

1. Persons Contacted

Licensee Employees

H. E. Yaeger, Site Manager
*J. K. Hays, Plant Manager - Nuclear
*J. E. Moore, Operations Superintendent - Nuclear
D. W. Haase, Technical Department Supervisor
V. B. Wager, Operations Supervisor
J. Wade, Chemistry Supervisor
G. G. Jones, Nuclear Plant Supervisor
J. E. Crockford, Nuclear Plant Supervisor
C. A. Coker, Nuclear Plant Supervisor
T. A. Finn, Nuclear Plant Supervisor
L. C. Huenniger, Nuclear Plant Supervisor
J. L. Whitehead, Nuclear Plant Supervisor
D. C. Bradford, Refueling Coordinator
W. A. Klein, Licensing Engineer
B. Abrishami, Systems Test Engineer
*J. P. Mendietta, Maintenance Superintendent
*D. W. Jones, QC Supervisor
*R. L. Caleman, Training Instructions Supervisor

Other licensee employees contacted included operators, craftsmen, technicians, security personnel, QC personnel, and engineering personnel.

*Attended monthly exit interview

2. Monthly Exit Interview

An interview was conducted on January 8, 1981 with plant management personnel. The inspector summarized the scope and findings for the month of December inspection activities to the persons indicated in paragraph 1. The plant manager acknowledged the stated violation on the lack of documentation for the Nuclear Turbine Operator training program and agreed to take corrective action. The item on failure to follow administrative procedure 103.5, "Administrative control of Valves, Locks and Switches" was reported by the inspector during the interview as a deviation. However, following review of this item, the inspector determined this to be a violation. This change was reported to the plant manager prior to the publication of this report.

3. Licensee Action on Previous Inspection Findings

(Closed) Infraction (50-250/80-16-01, 50-251/80-14-01) Failure to track implementation of corrective action to noncompliance 79-31-01. The inspector reviewed the licensee's corrective action and had no further questions.

(Closed) Deviation (50-250/80-16-02, 50-251/80-14-02) Failure to establish a maintenance instruction on Select-A-Torq by date committed in response to 79-31-01. The inspector reviewed the procedure issued April 25, 1980 and had no further questions.

(Closed) Inspector Followup Item (50-250/80-16-04, 50-251/80-14-04), Licensee to modify procedures to reduce chance of safeguards actuations. The inspector reviewed operating Procedure 0205.2 "Hot shutdown to cold shutdown condition" and noted that information regarding blockage of the high steam line differential pressure signal prior to reducing steam generator pressure below 500 psig had been included in a caution statement after step 8.8, and had no further questions.

4. Followup on Previous Unresolved Items

Not reviewed during this inspection report period.

5. New Unresolved Items

No new unresolved items were identified during this inspection report period.

6. Licensee Event Report Followup

During this inspection report period, the following Licensee Event Reports were followed up:

1. 250-80-21 T.S. 4.1 Seismograph Inoperative

2. 250-80-23 T.S. 4.1 Missed RWST Level Surveillance

The events were reviewed to assure the accuracy and completeness of the report and the appropriateness and efficiency of corrective actions taken. The inspector verified that the seismograph was repaired and returned to service.

No violations or deviations were identified within the areas inspected.

7. Surveillance Test Observations

Portions of the monthly surveillance testing on three safety-related system components were witnessed by the inspector. These were the component cooling water system 4A pump, the Unit 3 containment spray pumps, and the Auxiliary Feedwater System pump. The tests were performed in accordance to the following procedures: (1) Operating procedure 3104.1, "Component Cooling water system - periodic test of pumps"; (2) operating procedure 4004.1, "Containment Spray Pumps - Periodic Test; and (3) operating procedure

7304.1, "Auxiliary Feedwater System -Periodic Test". Performance dates for the above test activities were December 2, 1980, and December 8, 1980. The following inspection items were verified:

a. Testing is scheduled in accordance with technical specification requirements.

b. Procedures are being followed.

c. Testing is by qualified personnel.

d. LCOs are being met.

e. System restoration is correctly accomplished following testing.

No violations or deviations were identified for the areas inspected above.

8. Plant Operations

The inspector kept informed on a daily basis of the overall plant status and any significant safety matters related to plant operations. Discussions were held with plant management and various members of the operations staff on a regular basis. Selected portions of daily operating logs and operating data sheets were reviewed on at least a weekly basis during the report period.

The inspector conducted various plant tours and made frequent visits to the control room. Observations included witnessing work activities in progress, status of operating and standby safety systems, confirming valve positions, instrument readings and recordings, annunciator alarms, housekeeping, radiation area controls, and vital area controls.

During the conduct of routine plant tours inspections the inspector observed on December 16, 1980 that the motor control circuit breaker, 3-0726 for motor operated valve MOV-3-863A, (RHR heat exchanger to refueling water storage tank (RWST) or altenate LHSI) was not in the required condition. The breaker was found to be in an open position as it should be, but it was not locked. The licensee administrative procedure 0103.5, "Administrative Control of Valves, Locks and Switches" requires the circuit breaker 3-0726 be locked open with the valve closed (item 18.b of the valve lock and switch list).

This finding was brought to the Nuclear Plant Supervisor's attention, and was subsequently corrected by having the circuit breaker locked open. It appears that the lock may have been inadvertently left open following completion of the valve exercise test performed on valve MOV-3-863A on December 4, 1980. But this supposition could not be substantiated because per operating procedure 0202.1, "Reactor Startup - Cold Condition to Hot Shutdown Condition", step 8.20 which requires verification of valves MOV-863 A&B closed and their associated breakers locked open had been initiated. This step of the procedure had been accomplished some time between

December 4 and 6, 1980. However, it is evident that the administrative procedure A.P. 0103.5 was not followed in that testing performed on valve MOV-3-863A as well as MOV-3-863B per O.P. 0209.1, "Valve Exercising Procedure" should have required the supervisor to enter the valve position change in the locked valve deviation log of the subject administrative procedure. The record shows that no such entry had been made during the month of December, 1980. This is contrary to the requirements of the procedure and constitutes a violation. (50-250/80-38-01)

Informal discussions were held with operators and other personnel on work activities in progress and status of safety-related equipment or systems. The inspectors questions were satisfactorily answered. A review of the licensee's training program for unlicensed personnel, specifically oriented towards the Nuclear Turbine Operators (NTO) and nuclear operators (NO) was conducted by the inspectors. Informal discussions were held with the licensee training department instructions supervisor, the operations superintendent, and the NTOs. This included the review of NTO personnel training records. Based on the review, it was the inspectors understanding that the NTOs are considered to be fully qualified operators once they have completed the training program per the licensee administrative procedure A.P. 0303, "Nuclear Operator and Nuclear Turbine Operator Training and Retraining Program". The training program consists of classroom work (off-shift), in-the-field walk through of all equipment that the NOs and NTOs are responsible for, and on-the-job training (on-shift). Based on the information provided to the inspector the training records show that five out of ten NTOs did not complete the training program in accordance to the requirements of A.P.303.

The inspector has concluded that the licensee lacked adequate documentation for the NTO trainees in order to show that they have satisfactorily completed their training. This finding results in a violation, for the licensee failed to follow plant Administrative procedures A.P.303. In paragraph 5.1 of A.P.303 the following statement is made: "The Training Supervisor shall arrange for the Nuclear Operator or Nuclear Turbine Operator Trainee to be placed on shift to work with a regular shift operator on all phases of operations. On-shift check off guide sheets will be furnished to cover on-shift training and will be used to help evaluate each trainee, and the progress achieved shall be evaluated by the Training Supervisor". This step of the procedure was not followed in that the licensee was not able to provide NTO records covering on-shift training with check off guide sheets used for trainee evaluation and progress achieved.

Furthermore, paragraph 6.4.1 of the Technical Specifications states that a retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements and recommendations of Section 5.5, ANSI N18.1 -1971 and Appendix A to 10 CFR Part 55. Per Section 5.5 of ANSI 18.1-1971 the licensee should provide means in the training programs for appropriate evaluation of its effectiveness. Contrary to the above the licensee failed to maintain on-the-job training evaluation records for the NTOs. Failure of

the Training Supervisor to implement the requirements of A.P.303 constitutes a violation of Technical Specification 6.4.1. (250/80-38-02, 251/80-37-01)

Prior to and during the exit interview in the discussions held with the Training Supervisor the inspector was informed that classroom training for the NTOs will start early January, 1981 and that all the NTOs will be scheduled to complete their training by the end of 1981. The results of this training will be reviewed during a future inspection. (Inspector Followup Item 250/80-38-03, 251/80-37-02).

For Unit 4 the inspector observed a portion of the pressurizer safety valve bench testing performed during each refueling shutdown. Specifically, "pop" tests and seat leakage testing were witnessed on valves 4-551B and 4-551A, respectively. Also, the inspector performed walkdowns of the containment spray and high head safety injection systems to verify their operability for Units 3 and 4 outside containment.

No violations or deviations were identified within the areas inspected.

9. Plant Tours

During the Unit 3 steam generator inspection and tube plugging outage (November 26 through December 6, 1980) the licensee had also inspected and modified pipe supports for the Safety Injection and Residual Heat Removal Systems lines located inside the containment. The pipe supports were structurally reinforced based on the results of analyses performed by the Architect Engineering firm in accordance with IE Bulletin 79-14, "Seismic Analyses for As Built Safety Related Piping Systems".

Just prior to heatup of Unit 3, on December 4, 1980 the inspector performed a walkthrough inspection inside the containment with licensee personnel and visually inspected all of the piping support modifications.

No discrepancies were observed.