P.O. BOX 529100 MIAMI, FL 33152

USNRC REGION II
ATLANTA, GEORGIA

82 FEB 25 P3:28

FLORIDA POWER & LIGHT COMPANY

February 17, 1982
L-82-58

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 81-29

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

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/mbd

Attachment

cc: Harold F. Reis, Esquire

ATTACHMENT

RE. TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250, 50-251
IE INSPECTION REPORT 81-29

FINDING:

10 CFR 50, Appendix B, Criterion V and the accepted QA Program, Section 17.2.5 requires that activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances. FPL Topical QA Manual, Procedure QP 2.7 specifies that power plant engineering shall develop and maintain documents identifying those structures, systems, and components which are nuclear safety-related and these documents shall clearly identify the boundaries of safety-related systems.

Contrary to the above, Procedure EPP-QI 2.3A, Classification of Structures, Systems and Components - Turkey Point Plant prepared by Power Plant Engineering does not clearly identify safety related boundaries, in that on December 4, 1981, various licensee personnel had established three different valves as the safety related boundary of the feedwater system.

RESPONSE:

1. FPL concurs with the finding.

2. The precise boundaries of safety related systems were not clearly identified because of the multiple, sometimes conflicting commitments and requirements which impact on this area.

3. As corrective action, the safety related boundary was determined by supervisory personnel. The valve to be repaired was determined to be non-safety related and was repaired accordingly.

4. Prior to the inspection, FPL had initiated a major project to review plant systems in order to upgrade the existing Q List by increasing the specificity to the component level.

   In order to prevent recurrence, FPL intends to continue the project to completion.

5. The status of this revision is as follows: Our consultants who are preparing the revision are approximately 90% complete with their work. An internal FPL review of the first draft of the revision is complete with comments returned to the consultant. It is expected that the consultant will incorporate the comments in a second draft by the end of the first quarter of 1982. The issuance of this revision as an approved procedure is presently scheduled for June 1982.

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

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

That he is Vice President 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

Robert E. Uhrig

Robert E. Uhrig

Subscribed and sworn to before me this

17 day of February, 1982

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