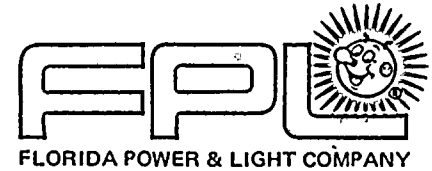


USNRC REGION II  
ATLANTA, GEORGIA

82 MAR 9 A 8:10



March 4, 1982  
L-82-80

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 and 4  
Docket Nos. 50-250 and 50-251  
IE Inspection Report 81-31

Florida Power and Light Company has reviewed the subject inspection report and a response is attached.

There is no proprietary information in the report.

We have reviewed the performance of the overpressure mitigating system during the overpressure transient. We feel that the corrective actions taken provide a high degree of assurance that the overpressure mitigating system will in the future properly perform its safety function.

Very truly yours,

Robert E. Uhrig  
Vice President  
Advanced Systems and Technology

REU/DWJ/mbd

cc: Harold F. Reis, Esquire

8203250307 820316  
PDR ADOCK 05000250  
Q PDR

1. The first part of the report is a general  
description of the project and its objectives.

2. The second part is a detailed description of the

methodology used in the study, including the data collection  
and analysis techniques.

3. The third part presents the results of the study, which  
show a significant correlation between the variables.

4. The fourth part discusses the implications of the findings and  
provides recommendations for future research.

5. The final part of the report is a conclusion that summarizes  
the main findings and reiterates the importance of the study.

6. The report also includes a list of references and a  
bibliography of the sources used.

7. The report is written in a clear and concise manner, and  
is easy to read and understand.

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4  
DOCKET NOS. 50-250, 50-251  
IE INSPECTION REPORT 81-31

FINDING A:

Technical Specification 6.8.1 requires that written procedures be established and implemented that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972. Section 5.3.6 of ANSI N18.7 requires measurements to keep safety parameters within operational and safety limits.

Contrary to the above, the Overpressure Mitigating System (OMS) functional test was inadequate in that the summator circuitry was not tested. This resulted in failure to discover the OMS was inoperable and contributed to the reactor coolant system overpressure events of November 28 and 29, 1981.

RESPONSE:

(A-1) FPL concurs with the finding.

(A-2) The Overpressure Mitigating System (OMS) functional test requires the introduction of a simulated overpressure signal. During the test, the summator was bypassed because the summator is used to provide a constant D.C. signal as a reference or setpoint for the OMS circuitry. In this operating region the summator output does not change with the input Reactor Coolant system temperature change. Because of this it was determined that the best testing method would be to introduce the test signal at the summator output.

(A-3) As corrective action and in order to prevent recurrence, we have

(A-4) evaluated the OMS performance during the overpressure incident and made the following revisions:

- a) Operating Procedure 1001.1, Filling and Venting the Reactor Coolant System, has been changed to include verification that instrument block valves are correctly aligned. The procedure has been updated to include testing of OMS at two different steps in the procedure, and addition of transmitter and summator checks to the tests.
- b) Operating Procedure 1004.4, Overpressure Mitigating System Functional Test of Nitrogen Back-up System has been changed to include checks on applicable pressure transmitters, summator output, and recording of actual test data.
- c) Operating Procedure 0205.2, Reactor Shutdown, Hot Shutdown to Cold Shutdown Conditions, has also been revised to include additional checks on OMS summators.

(A-5) Full compliance was achieved on March 1, 1982.



11



#### FINDING B

Technical Specification 6.8.1 requires that written procedures be established that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972. ANSI N18.7-1972 Section 5.3.4.1 requires instructions for starting up including the requirement that valves be properly aligned.

Contrary to the above, alignment of instrumentation root valves were not included in station procedures prior to reactor coolant system fill after refueling or plant startup.

#### RESPONSE:

- (B-1) FPL concurs with the finding.
- (B-2) These valves were inadvertently omitted from the plant startup procedures.
- (B-3) As corrective action and in order to prevent recurrence, Operating and Procedure 0202.1, Reactor Startup, Cold Conditions to Hot Shutdown
- (B-4) Conditions, will be changed to include root valve alignment checks on instruments affecting alarm functions, automatic action, and transient control.
- (B-5) Full compliance will be by April 15, 1982.



11



STATE OF FLORIDA     )  
                              )  
COUNTY OF DADE     )     ss.

J. W. Williams, Jr., 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

*J. W. Williams, Jr.*

J. W. Williams, Jr.

Subscribed and sworn to before me this

4 day of March, 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~~

RECEIVED  
FEB 10 1964  
U.S. AIR FORCE  
HEADQUARTERS  
WASHINGTON, D.C.