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L-85-222

Dr. J. Nelson Grace
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, Georgia 30303

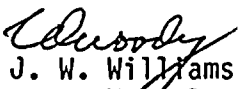
Dear Dr. Grace:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Inspection Report 250-85-06 & 251-85-06

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

There is no proprietary information in the report.

Very truly yours,

for 
J. W. Williams, Jr.
Group Vice President
Nuclear Energy Department

JWW/JA/ms/
Attachment

cc: Harold F. Reis, Esquire

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ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket No. 50-250, 50-251
IE Inspection Report 85-250-06 and 85-251-06

FINDING 1:

Technical Specification (TS) 4.1, Table 4.1-1, requires that each power range nuclear instrument (NI) channel be calibrated quarterly. TS 1.7.3 requires that a channel calibration encompass the entire channel.

Contrary to the above, as of April 1, 1985, quarterly calibrations of the Power Range NI channels did not encompass the entire channel in that the Power Range NI output signal from each instrument's lower detector was not verified to supply an input to the over temperature delta temperature (OTDT) and over power delta temperature (OPDT) protective circuits.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) Previously, the nuclear instrumentation system (NIS) and OTDT and OPDT circuits as well as the axial flux drawers were checked independently of each other. The procedures used did not take into account the inter-connecting wiring and, therefore, did not test the entire channel as required by TS.
- 3) Maintenance Procedure (MP) 12307.3, "Quarterly and Standard Calibration of the Nuclear Power Range Instrumentation, Axial Flux Deviation Process Instrumentation to Over Power Set Point (OPSP) and Over Temperature Set Point (OTSP), and Nuclear Power Range Axial Flux Deviation Alarm", will be revised to require testing of the entire channel. The test will originate at the NIS cabinet and verify proper voltage and polarity at the OPSP and OTSP inputs as well as the axial flux inputs.
- 4) To preclude recurrence, the Procedure Upgrade Program is revising surveillance procedures to ensure that the requirements of the Technical Specifications are properly implemented. Completion of this action is presently covered under the Performance Enhancement Program (PEP) schedules and controls.
- 5) Full compliance for Item 3 above will be achieved by July 1, 1985.

FINDING 2:

TS 4.15.2.a.5 requires that each testable valve in the fire protection water system be cycled annually. TS 4.15.2.a.3 requires that each valve in the fire protection water system flow path be verified to be in its correct position monthly. TS 4.18.1 requires a monthly fire suppression water system walkdown to verify that each accessible valve is in its correct position.



Contrary to the above, prior to April 1, 1985, four accessible and testable valves in the fire protection (suppression) water system were neither cycled annually nor verified monthly to be in their correct positions.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was that the fire water protection flowpaths for Units 3 and 4 were not clearly defined. The drawing for the fire water protection system included the flowpath around fossil Units 1 and 2 but this flowpath was not considered part of the flowpath for Units 3 and 4. Because of this, these valves were not cycled as part of the annual or monthly fire water protection system surveillances.
- 3) Post indicator valves (PIVs) 7, 8, 10, 11 and 31 located in the Units 1 and 2 flowpath were visually inspected and cycled. No discrepancies were found with the valves.
- 4) a) Surveillance procedure, 0-OSP-016.3, "Annual Surveillance of Fire Suppression System Flow Path Valves", will be revised to include visual inspection of PIVs 7, 8, 10, 11 and 31.

Administrative Procedure AP 0103.19, "Monthly Verification of Safety-Related Systems Flowpaths", will be revised to include visual inspection of PIVs 7, 8, 10, 11 and 31 located in the flowpath for Units 1 and 2. These changes will remain in effect until an assessment is performed on the results of the engineering evaluation and the appropriateness of the corrective actions.

- b) In the interim, a plant work order for the fossil Units 1 and 2 will be written on a monthly basis to visually inspect PIVs 7, 8, 10, 11 and 31.
 - c) An engineering evaluation will be performed to clearly specify what are the bounds of fire water suppression system flowpath for the nuclear Units 3 and 4. An assessment will be performed of the engineering evaluation and corrective actions will be taken as necessary.
- 5) a) Full compliance for Item 3 above was achieved by April 5, 1985.
 - b) Full compliance for Item 4.a above will be achieved by July 1, 1985.

