

AUG 5 1985  
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Dr. J. Nelson Grace  
Regional Administrator, Region II  
U.S. Nuclear Regulatory Commission  
101 Marietta Street N.W., Suite 2900  
Atlanta, Georgia 30323

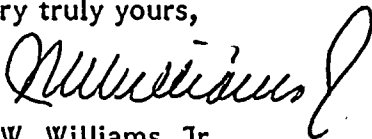
Dear Dr. Grace

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inspection Report 85-20

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,

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

JWW/PLP:mls

Attachment

cc: Harold F. Reis, Esquire  
PNS-LI-85-284

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## ATTACHMENT

Re: Turkey Point Units 3 and 4  
Docket No. 50-250, 50-251  
IE Inspection Report 250-85-20 and 251-85-20

### FINDING 1:

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

Appendix A of USNRC Regulatory Guide 1.33, recommends that written procedures be developed for combating emergencies such as loss of electrical power and degraded power sources.

ANSI N18.7-1972, Section 5.3.8.2, Events of Potential Emergency, states that events of potential emergency shall be identified and procedures for coping with them shall be prepared. The loss or degradation of a vital power supply is specified as a potential emergency.

Off Normal Operating Procedure (ONOP) 4-ONOP-003.6, Loss of 120 Volt Vital Instrument Panel 4P06, was established to specify immediate and subsequent operator actions necessary to cope with a loss of this vital instrument power.

Contrary to the above, as of June 6, 1985, procedure 4-ONOP-003.6, was inadequately established, in that it did not address the following failures which occur when vital instrument power Panel 4P06 is lost, nor the actions necessary to cope with these failures:

- a. The loss of all pressurizer heaters and a method of restoring the heaters to service;
- b. The loss of pressurizer spray valve control and a method of securing undesired spray actuation;
- c. The loss of RCS letdown flow control and a method of restoring letdown flow.

### RESPONSE:

- 1) FPL concurs with the finding.
- 2) The original scope of the procedure for loss of 120 volt vital instrument panel 4P06 did not identify the need to address the above mentioned failures.

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- 3) a) 4-ONOP-003.6 and 3-ONOP-003.6 were reviewed and revised to include the actions necessary to cope with the above mentioned failures. In addition, other sections of 3(4)-ONOP-003.6 along with the other off-normal operating procedures for the loss of 120 volt vital instrument panels [3(4)-ONOP-003.7, 3(4)-ONOP-003.8 and 3(4)-ONOP-003.9] were revised.
  - The symptoms section was expanded to identify what instrumentation is affected upon loss of a 120 volt vital panel.
  - The subsequent operator actions section was expanded to include actions to be taken if no automatic turbine runback has occurred, if an automatic turbine runback has occurred and if a reactor trip has occurred.
  - The procedures are now oriented toward monitoring average reactor coolant system (RCS) temperature (Tave), reactor power, pressurizer pressure, and steam generator levels to stabilize the unit.
  - Guidance has been provided on how long a unit can operate without restoring power to a vital instrument panel.
- 4) a) Training Brief number 71, "Inverter Failure - Unit 3 and 4" was issued on June 24, 1985 to identify several items of importance to operators. Among these is the optimum selector switch alignment during normal operation. This alignment reduces the need to change switch positions after the loss of an inverter thus allowing the operator to concentrate on stabilizing the unit.
- b) Training Brief number 78 was issued on July 29, 1985 to provide some additional information if the selector switch alignments must be different than those identified in Training Brief number 71.
- c) Training was given on the revisions to 3(4)-ONOP-003.6 - 003.9, discussed in item 3 above, by having the Plant Supervisor - Nuclear review the revised procedures with his operating crew.
- 5) Full compliance with Item 3 above was achieved on June 28, 1985.  
Full compliance with Item 4.c above was achieved by July 1, 1985.

**FINDING 2:**

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

ANSI N18.7-1972, Section 5.1.6.1, Quality of Equipment, requires that maintenance that can affect the performance of safety-related equipment shall be properly preplanned and performed in accordance with approved procedures, documented instructions or drawings appropriate to the circumstances.



Preoperational Procedure 0800.55, Diesel Generator A Breaker 4AA20 Control Rerouted Cable Preoperational Test, provides instructions to ensure proper operation of rerouted cables connecting the diesel generator to the 4A, 4160 Volt, vital bus. Step 9.1 of 0800.55 requires that permission to perform the test be obtained from the Plant Supervisor-Nuclear. Section 5.2 requires that communication be established between the control room and the technicians testing the equipment.

Contrary to the above, on June 4, 1985, Preoperational Procedure 0800.55 was not properly implemented, in that:

- a. A continuity check required by step 9.8 was begun prior to receiving permission from the Plant Supervisor-Nuclear to begin the test;
- b. Communication was not established between the control room and the test site. Consequently, control room personnel were not aware that procedure 0800.55 was in progress.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was inadequate communication between the Relay and Startup departments during the testing.
- 3) Upon discovery of the missed requirement, Plant Supervisor-Nuclear permission was immediately obtained and a Quality Control hold point was added to Preoperational Procedure 0800.55 by an on-the-spot change to ensure procedural compliance.
- 4) Departmental guidelines will be developed to provide guidance for developing future preoperational procedures requiring the support of expertise not available within the Startup Department.
- 5) Full compliance with Item 3 above was achieved on June 4, 1985.  
Full compliance with Item 4 above will be achieved by September 6, 1985.

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