



85 SEP 4 P 3: 00

AUG 29 1985

L-85-342

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 250-85-24 and 251-85-24

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,

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 85-250-24 and 85-251-24.

FINDING 1:

Technical Specification (TS) 3.5, Instrumentation, delineates the conditions of the instrumentation and safety circuits necessary to ensure reactor safety. Table 3.5-2, Engineered Safety Features Actuation, Item number 1.5, requires the high steam flow in two of three steam lines with the low average temperature safety injection (SI) circuit to be operational when the reactor is not in cold shutdown. Note 2 of Table 3.5-2 states that this safety injection signal may be manually bypassed when cooling down the reactor and the average temperature is below 543 degrees F.

Contrary to the above, on May 30, 1985, following a Unit 4 reactor trip, the high steam flow in two of three steam lines with low average temperature safety injection circuit was intentionally made unavailable by use of the SI block switch. The SI signal was manually blocked when average coolant temperature was above 543 degrees F. No reactor cooldown was in progress. The safety circuit remained blocked for approximately one hour.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was operator judgment during an off-normal condition (loss of a vital instrument bus) and a coincident failed instrument channel (Tave). The judgment was based on confirmed plant parameters outside the failures and the desire to minimize an undue challenge to the safeguards system as a result of a spurious signal being generated by an instrument failure.
- 3) Operating Procedures (OPs) 0205.1, "Unit Shutdown - Full Load to Hot Shutdown Condition", and 0205.2, "Reactor Shutdown - Hot Shutdown to Cold Shutdown Condition", have been reviewed and revised to emphasize the Technical Specification (TS) requirement of maintaining the safety injection signal in an unblocked condition when the reactor coolant system (RCS) temperature is greater than 543 degrees Fahrenheit or the RCS pressure is greater than 2000 psig regardless of plant conditions.
- 4) A training brief will be issued to emphasize the procedure changes in Item 3.
- 5)
 - a) Full compliance for Item 3 above will be achieved by August 31, 1985.
 - b) Full compliance for Item 4 above will be achieved by September 6, 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 section 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, Section 8, Item (1)K, recommends that surveillance procedures be written covering control rod operability and scram time tests. Operating Procedure (OP) 1604.8, dated April 16, 1984, entitled CRDM/RPI Stepping and Drop Time Test, provides instructions for performing the rod control cluster stepping test, the rod drop time test and the rod position indication system calibration. Figure 1 of OP 1604.8 identifies the proper way to perform the rod drop time measurements.

Contrary to the above, on June 25, 1985, OP 1604.8 was not properly implemented, in that rod drop time measurements for shutdown bank A were calculated in a manner contrary to that identified in Figure 1 of the procedure. This resulted in the recording of erroneous rod drop travel times for shutdown bank A.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was failure to strictly comply with the requirements of OP 1604.8.
- 3) The rod drop times for shutdown bank A were immediately recalculated. This increased the rod drop times by less than 0.1 seconds, making the average rod drop time 1.335 seconds. Technical Specification 3.2.3 requires that the rod drop time of each control rod shall not be greater than 2.4 seconds at full flow and operating temperature from beginning of rod motion to dashpot entry.
- 4) Strict procedural compliance was re-emphasized to the responsible people upon identification of the problem.
- 5) Full compliance for Items 3 and 4 above was achieved by June 26, 1985.



FINDING 3:

TS 4.1, Operational Safety Review, requires that equipment and sampling tests shall be conducted as specified in Table 4.1-2. Item 10 of Table 4.1-2 requires that accumulator boron concentration be sampled prior to heatup above 200 degrees F.

Contrary to the above, on June 22, 1985, the Unit 3 primary coolant system was heated above 200 degrees F without prior performance of the accumulator boron concentration analysis.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) At the time of the incident, the accumulators were drained and preparations were being made for a reactor coolant system heatup to greater than 200 degrees Fahrenheit. A conflict in sampling criteria vs. equipment availability criteria was misinterpreted thus allowing an on-the-spot change (OTSC) to be made to Operating Procedure (OP) 0202.1, "Reactor Startup - Cold Shutdown to Hot Shutdown Conditions", that moved the accumulator sampling to a later step in the procedure.
- 3) The OTSC was cancelled in order to re-establish the TS requirement back into the procedure at the proper sequence.
- 4) The TS upgrade project and associated changes directed at reduced conflicts and improved action statements should aid in preventing recurrence of this type of incident. Completion of this action is presently covered under the Performance Enhancement Program schedules and controls.
- 5) Full compliance for Item 3 above was achieved by July 2, 1985.

