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DEC 18 1985
L-85-458

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 250-85-34 & 251-85-34

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/K2
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 250-85-34 and 251-85-34

FINDING:

10 CFR 50 Appendix B, Criterion XVIII states that a comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program. The licensee's accepted Quality Assurance (QA) Program (FPLTQAR 1-76A, Revision 7, Appendix C) endorses Regulatory Guide 1.144 and ANSI N45.2.12 (1977). Regulatory Guide 1.144, Regulatory Position C.3.b(2)(b) requires applicable elements of a suppliers QA program to be audited by the purchaser on a triennial basis.

Contrary to the above, the licensee's implementing procedure 017QAD6, Revision 4, paragraph 5.1(2) does not require triennial audits of American Society of Mechanical Engineers (ASME) vendors. Therefore, triennial audits of ASME vendors are not being implemented by the purchaser.

Response:

- 1) FPL concurs with the violation.
- 2) FPL's interpretation of Regulatory Guide 1.144 and ANSI/ASME N45.2.12 (1977) allowed credit of ASME Survey to meet the triannual audit requirements for purchases from ASME vendors.
- 3)
 - a) All ASME vendors who have not been audited within the past three years have been removed from the QA Approved Suppliers List (QA-ASL) as of December 1, 1985 and will not be placed on the list until an appropriate audit has been performed.
 - b) A policy was immediately implemented to require ASME vendors to be audited on a triannual basis, independent of ASME Surveys.
- 4) QI 7 QAD 6, "Methods for Supplier Evaluation", has been revised and submitted for approval to require triannual audits of ASME vendors.
- 5) Full compliance will be achieved by January 31, 1986, with issuance of the revision to QI 7 QAD 6 procedure.

