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L-86-26

Dr. J. Nelson Grace  
Regional Administrator, Region II  
U.S. Nuclear Regulatory Commission  
101 Marietta Street  
Atlanta, Georgia 30323

Dear Dr. Grace:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250, 50-251  
Inspection Report 250-85-37 & 251-85-37

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,

C. O. Woody  
Group Vice President  
Nuclear Energy Department

COW/SAV:dh  
Attachment

cc: Harold F. Reis, Esquire  
PNS-LI-86-19

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## ATTACHMENT

Re: Turkey Point Units 3 and 4  
Docket No. 50-250, 50-251  
IE Inspection Report 250-85-37 & 251-85-37

### FINDING:

Technical Specification (TS) 4.5.2.b.3 requires that accumulator check valves be checked for operability during each refueling shutdown.

The Final Safety Analysis Report (FSAR), section 6.2.4, states that test circuits are provided to periodically examine the leakage back through the accumulator check valves and to ascertain that these valves seat whenever the reactor system pressure is raised. The test circuits and accumulator check valves 875 A, B, C, D, E, and F are described in FSAR Section 6.2 and are shown in figure 6.2.1.

Contrary to the above, since 1976 TS 4.5.2.b.3 has not been implemented, in that accumulator check valves 875 D, E and F were not periodically examined to ascertain that they were seating nor were they tested for back leakage. Testing which was performed was inadequate in that only check valves 875 A, B and C were verified to be seated and not leaking excessively.

### RESPONSE:

- 1) FPL concurs with the finding in that accumulator check valves 875 D, E, and F were not tested in accordance with the requirements of FSAR Section 6.2.
- 2) The Final Safety Analysis report describes back leakage testing of the accumulator discharge check valves. The purpose of this testing is to ensure that back leakage from the reactor coolant system does not dilute the accumulator boron concentration below the required 1950 ppm boron during the normal required sample interval. Testing of 875 D, E, and F was originally performed using the installed Safety Injection (SI) test circuits. These tests tended to have varying results that were not representative of the actual inservice conditions to which the accumulators were exposed. This is because check valves 875 A, B, and C isolate the accumulator check valves from RCS pressure. Valves 875 A, B, and C are tested as RCS Pressure Isolation Valves per Technical Specification (TS) 3.16 using the SI test circuits. To obtain a more representative test condition the accumulator inleakage test was evaluated and subsequently modified to perform a leakage determination based on accumulator level change. The results of the inleakage test were used to vary the boron sample interval to ensure that the minimum required accumulator boron concentration was maintained. The test is performed after the accumulators are placed in service by opening the discharge isolation motor operated valve.

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- 3) A re-evaluation of the test method presently being used was performed on November 6, 1985. This re-evaluation was performed per 10CFR50.59 and concluded that the test method being used did not present an unreviewed safety question. In fact, it is more representative of normal plant conditions than tests performed using the installed SI test circuits.

Technical Specification (TS) 4.5.2.b.3 requires that the accumulator check valves be checked for operability during each refueling shutdown. The test has been properly performed by exercising the accumulator check valves 875 D, E and F to the open position per plant operating procedure OP 4104.2, Engineered Safeguards and Emergency Power Systems Integrated Test, Step 8.9. The safety function of the accumulator discharge check valves is to open to dump the accumulator contents of borated water during reflood and to partially refill the reactor vessel during a large break loss of coolant accident. The valves are not valves for which seat leakage is limited to a specific amount in the closed position for fulfillment of their function. The flow test performed per OP 4104.2 is sufficient to ensure that the valves are capable of performing their intended safety function and is consistent with the approved Inservice Testing Program which does not require a seat leak test of check valves 875 D, E, and F.

The re-evaluated test method along with the exercise open flow test performed each refueling per OP 4104.2, are sufficient to ensure that the accumulator discharge check valves 875 D, E, and F are operable and tested per TS 4.5.2.b.3.

- 4) FPL plans to continue the engineering evaluation of the inleakage test method to ensure accurate results in order to maintain the accumulator sample interval consistent with actual inleakage. Inconsistencies in the FSAR requirements will be reviewed as part of the evaluation and revisions to the FSAR will be requested as necessary. This evaluation is scheduled to be completed by the end of the upcoming Unit 4 refueling outage.
- 5) a) Full compliance for Item 3 above was achieved by November 6, 1985.  
b) Full compliance for Item 4 above will be achieved by the end of the current Unit 4 refueling outage.

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