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FLORIDA POWER & LIGHT COMPANY

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L-86-128

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

Dear Dr. Grace:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
Inspection Report 85-44

Florida Power & Light 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/JA:dee

Attachment

cc: Harold F. Reis
PNS-LI-86-128

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ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket No. 50-250, 50-251
IE Inspection Report 250-85-44 & 251-85-44

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.

FINDING 1.a:

Appendix A of USNRC Regulatory Guide 1.33 recommends that written procedures be established covering the startup, operation and shutdown of the emergency core cooling system (ECCS). The cold leg accumulators constitute a portion of the emergency core cooling system.

The Final Safety Analysis Report (FSAR) does not consider the consequences of a loss of coolant accident (LOCA) when the cold leg accumulators are unavailable.

Operating Procedure (OP) 0202.1, Reactor Startup - Cold Condition to Hot Standby Condition, recommends, but does not require, that the cold leg accumulators be placed in service prior to exceeding 1000 pounds per square inch (psi) reactor coolant system pressure.

Contrary to the above, OP 0202.1 was not adequate, in that it allowed the units to be operated at full temperature and pressure without the cold leg accumulators in service, that is, to be operated in an unanalyzed configuration without regard for the possibility that an accident of a different type than any previously identified in the FSAR could occur.

Between June 23 and 26, 1985, the Unit 3 reactor was operated at full temperature and pressure (hot standby condition) while all three accumulators were empty and depressurized. On several additional occasions, the licensee has failed to maintain the required level and pressure in the accumulators while the units were in hot standby.

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RESPONSE:

- 1) FPL concurs with the finding.
- 2) OP 0202.1 did not require that the accumulators be placed into service prior to exceeding 1000 psi in the reactor coolant system (RCS). When the operators reached this step and experienced difficulty in placing the accumulators in service, they consulted both Technical Specifications (TS) and the Final Safety Analysis Report (FSAR) for additional guidance. In order to fill the accumulators, MOV-*-869 is required to be open. TS 3.15 requires MOV-*-869 to be closed and its breaker racked out whenever the RCS temperature is less than or equal to 380 degrees Fahrenheit. TS 3.4.1.a requires the accumulators to be operable before taking a reactor critical except for low power physics testing. TS 3.4.1.b provides an action statement for loss of one accumulator for a reactor at power that requires a unit to be placed back in service within the specified times. The FSAR does not describe the requirement to have the accumulators in service prior to exceeding 1000 psi in the RCS. Since no requirements could be found to have the accumulators in service prior to exceeding 1000 psi, the unit heat up was continued with the accumulators out of service.
- 3) In accordance with guidance from the Office of Nuclear Reactor Regulation, step 8.35 of OP 0202.1 has been revised to require that the accumulators be filled and pressurized prior to exceeding 1000 psig.
- 4) FPL is currently developing a revision to the existing Technical Specifications to improve the format, content and overall margin of safety. This revision includes adoption of the Westinghouse Standardized Technical Specification format. Completion of this action is presently covered under the Performance Enhancement Program (PEP) schedules and controls.
- 5) Full compliance for Item 3 above was achieved by January 21, 1986.

FINDING 1.b:

ANSI N18.7-1972, section 5.3.(3), Post-Maintenance Checkout and Return to Service, requires that instructions shall be included in maintenance procedures for returning equipment to its normal operating status. It further states that operations personnel shall place the equipment in service and verify and document its functional acceptability. Special attention shall be given to restoration of normal conditions, such as removal of signals used in maintenance or testing, and to systems that can be defeated by leaving valves or breakers mispositioned.

Contrary to the above, during the performance of maintenance repairs on the "B" emergency diesel generator (EDG) day tank level switch (LS 1561B), using maintenance work orders 63-8224 and 69-4437, instructions were not included or referenced in the work orders regarding restoration of valves to their normal positions. Consequently, on December 10, 1985, two level switches, located adjacent to the work area, were not returned to service because their isolation valves were inadvertently left shut. This disabled both the remote day tank low level alarm and the automatic start capability of the "B" fuel oil transfer pump.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The guidance available to plant personnel did not provide sufficient instructions for restoration of components that had been manipulated within the equipment clearance boundary.
- 3) Upon identification of this discrepancy, the two level switches were promptly returned to service.
- 4) Administrative Procedure (AP) 0103.4, In-Plant Equipment Clearance Orders, has been revised to require that prior to releasing a clearance the components within the clearance boundary will be aligned in accordance with the applicable plant procedure for the required mode of operation.
- 5) Full compliance for Item 4 above was achieved on March 11, 1986.

