

86 APR 28 P 2: 04

APR 25 1986  
L-86-179

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 250-85-22 and 251-85-22

Florida Power and Light Company has reviewed the subject inspection report and has revised our response as per discussions with Mr. D. Falconer of your staff.

There is no proprietary information in the report.

Very truly yours,

C. O. Woody  
Group Vice President  
Nuclear Energy Department

COW/JA:de

Attachment

cc: Harold F. Reis, Esquire  
PNS-LI-86-132

8605050213 860425  
PDR ADDCK 05000250  
Q PDR

LI:1

40:3.

## ATTACHMENT

Re: Turkey Point Units 3 and 4  
Docket No. 50-250, 50-251  
IE Inspection Report 250-85-22 and 251-85-22

### FINDING 1:

10 CFR, Part 50, Appendix B, Criterion V, requires that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished".

Technical Specification 6.8.1 requires that written procedures be established and implemented that meet or exceed the recommendations of Appendix A of USNRC Regulatory Guide 1.33.

Contrary to the above, the licensee failed to:

### FINDING 1.a and 1.b:

- a) Establish adequate maintenance procedures to ensure the proper wiring of the D.C. input filter circuit of the 4A static inverter which resulted in the miswiring of the filter circuit and contributed to reactor trips on September 20, 1984, and October 9, 1984.
- b) Implement Administrative Procedure 0190.19, Control of Maintenance on Nuclear Safety Related and Fire Protection Systems, in the rewiring of the input filter section of the 4A inverter to correct the deficiency identified in example (a) above. This rewiring was performed under Plant Work Order (PWO) 407615 which did not define the work to be done or any QC inspections or hold points.

### RESPONSE:

- 1) FPL concurs with the finding.
- 2) The miswiring is believed to have occurred in May, 1984 during the trouble shooting of the first 1984 4A inverter problem. At this time a PWO was used for trouble shooting and independent verification and/or supervisory hold points were not widely used. Since the time of the event, additional controls have been established to enhance the control of maintenance on nuclear safety related and fire protection systems.
- 3) Administrative procedures (APs) and Electrical Department Guidelines have been revised to provide more detailed instructions and/or increased use of supervisory hold points to be used for the preparation of PWO work descriptions.



- 4) Supervisory personnel have been made aware of the requirements of AP 0190.19, "Control of Maintenance on Nuclear Safety Related and Fire Protection Systems," and the Electrical Department Administrative Guideline.
- 5) Full compliance for items 3 and 4 above was achieved by May 29, 1985.

FINDING 1.c:

Establish abnormal operating procedures to contend with the loss of the 4A Motor Control Center which resulted in the 4AA05 and 4AB05 Bus Supply Fans being rendered inoperable due to operators failing to close Breaker 40521 on May 17, 1985.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The requirements of a clearance order specified in operating procedures 3(4)-OP-007, "480 Volt Motor Control Centers", provide a means of covering removal and restoration of breakers. However, during an off-normal or emergency situation this procedure did not provide specific enough guidance.
- 3) The MCC procedures have been reviewed and it was decided that the generation of an off-normal operating procedure was not necessary and that a revision to the current operating procedures would be appropriate.
- 4) In our original response, Turkey Point Plant committed to revise 3(4)-OP-007 to provide step-by-step instructions for loading and unloading of the breakers in the 480 volt motor control centers in the infrequent operations section. During the review process of this procedure it was determined that this information should be placed in Section 5.0, Startup/Normal Operation and Section 6.0, Shutdown.
- 5) Full compliance for item 4 above was achieved on August 30, 1985.

FINDING 1.d:

Implement Administrative Procedure 0103.3, Use of Temporary System Alterations on July 6, 1984, for a temporary system alteration to the 3C Accumulator Hi-Low Level circuit.

RESPONSE:

- 1) FPL concurs with the finding.



Page 3

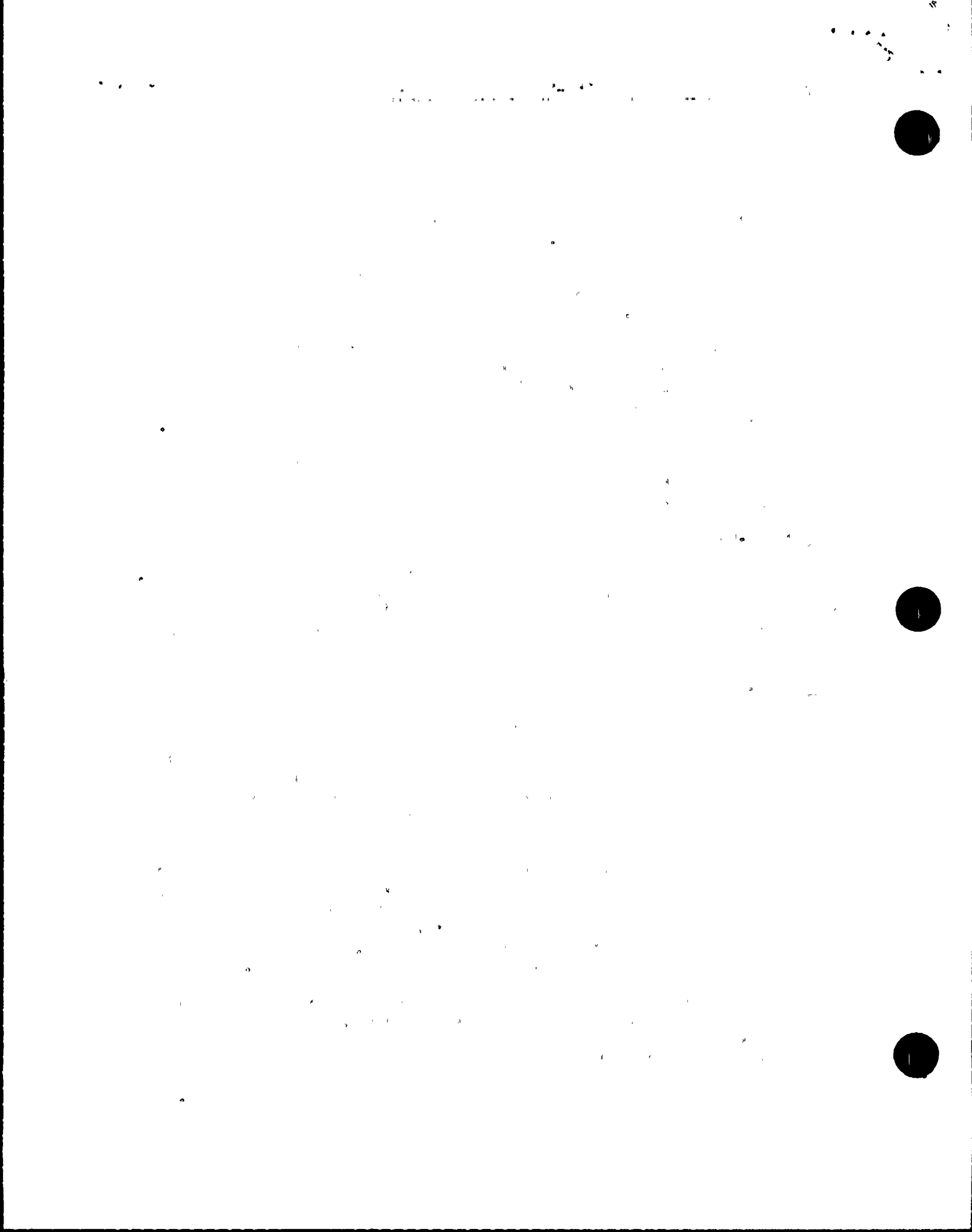
- 2) The reason for the finding was that the temporary system alteration (TSA) number was not written on the plant work order (PWO) and the TSA log had been rewritten and was not required to be retained as a Quality Assurance Record.
- 3) The TSA number will be entered on the PWO until the TSA procedure can be revised to ensure that TSA log is maintained as a Quality Assurance Record.
- 4) Administrative Procedure 0103.3 has been replaced by Administrative Procedure 0-ADM-503, "Control and Use of Temporary System Alterations". This revision to the TSA procedure enhances the method of controlling and processing TSAs. A revision to 0-ADM-503 will be made to include the TSA log as a Quality Assurance Record.
- 5) Full compliance for item 3 above was achieved by July 22, 1985  
Full compliance for item 4 above will be achieved by September 30, 1985.

FINDING 1.e:

Implement Maintenance Procedure 9707.1, Inverter Periodic Instruction, while placing the 3C inverter in service. The DC input breaker was closed prior to charging the capacitors resulting in a trip of the 3C inverter, the 4C inverter, and a Unit 4 reactor trip on June 20, 1985.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The journeyman electrician working on the 3C inverter did not follow the procedure while attempting to start the 3C inverter. The extent of the impact of this action on Unit 4 was due to lack of proper breaker coordination between the 3C and 4C inverters which share a common DC bus.
- 3) The individual involved was counseled on the requirement to follow procedures. The DC input breaker settings of the inverters were surveyed and changes made to eliminate any potential interaction between Unit 3 and Unit 4 inverters. A test was run on Unit 3 duplicating the actions of the earlier event, and this time only the 3C inverter tripped and the 4C inverter was not affected.
- 4) The Procedure Upgrade Program is currently revising maintenance procedures to make them easier to work with. 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 August 2, 1985.





FINDING 1.f:

Implement Administrative Procedure 0190.26, Section 8.51, and perform PM-74035, the Calorimetric Instrumentation Periodic Calibration, at the frequency designated by the computerized preventive maintenance file.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The procedure was recently revised to delete some items which were done due to fuel contract requirements. It was intended to convert the subject PM to an annual PM but this administrative change had not yet been done.
- 3) We are presently in the process of finalizing the subject PM for both units.
- 4) Prior to changing a PM requirement, the past history of the PM will be reviewed to insure there is a basis for changing PM requirements.
- 5) Full compliance for item 3 above is scheduled to be achieved by September 15, 1985.

