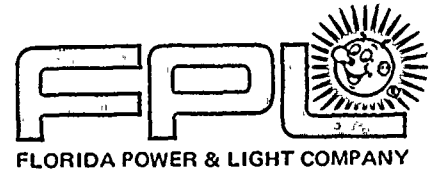


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MAY 1 1986

L-86-186

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 86-09

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:de

Attachment

cc: Harold F. Reis, Esquire
PNS-LI-86-138

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PEOPLE...SERVING PEOPLE

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ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket No. 50-250, 50-251
Inspection Report 250-86-09 & 251-86-09

FINDING 1:

Technical Specification Section 6.5.2.8.h requires an independent fire protection and loss prevention inspection and audit to be performed annually utilizing either qualified licensee personnel or an outside fire protection firm. NRC Generic Letter 82-21 describes the general scope of the fire protection audits and identifies the composition and qualifications of the auditors.

Contrary to the above, an independent fire protection and loss prevention inspection and audit by qualified licensee personnel or outside fire protection firm has not been performed at Turkey Point since July 1984.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was that although the required audit was conducted there was a personnel error in that the inspection team leader did not ensure that the make up of the audit team met all applicable requirements.
- 3) The fire prevention portion of the 1985 audit will commence on May 2, 1986 using qualified fire protection personnel.
- 4) The policy for fire protection audits is being revised, placing full scheduling and coordinating responsibility under the Quality Assurance Department. These responsibilities will be documented as a Quality Instruction (QI).
- 5) Full compliance for Item 4 above will be achieved by July 31, 1986.

FINDING 2:

Technical Specification Section 6.4.2 requires the fire brigade training program to meet the applicable portions of 10 CFR 50 Appendix R. Technical Specification Section 6.8.1 requires written procedures and administrative policies to be established, implemented and maintained, that meet or exceed the requirements of the fire protection program. Turkey Point fire protection program procedure AP15500 Section 8.1.3 and 10 CFR 50 Appendix R Section III.I.3.b require fire brigade drills to be performed at regular intervals not to exceed three months for each shift fire brigade team.

Contrary to the above, during 1985 regular fire brigade drills were conducted, but the frequency between eight of the 19 drills conducted exceeded the specified three months maximum time interval.



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[illegible]

$\Delta G^\circ = \Delta G_f^\circ(\text{products}) - \Delta G_f^\circ(\text{reactants})$

Year	1990	1991	1992	1993	1994
1990	1.0	1.0	1.0	1.0	1.0
1991	1.0	1.0	1.0	1.0	1.0
1992	1.0	1.0	1.0	1.0	1.0
1993	1.0	1.0	1.0	1.0	1.0
1994	1.0	1.0	1.0	1.0	1.0

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Re: Inspection Report 250-86-09 & 251-86-09

Page 2

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was that the 3 month interval was incorrectly interpreted to mean once in a quarter. This interpretation allowed a drill to be held at the beginning of one quarter and at the end of the subsequent quarter which could exceed the 3 month interval.
- 3) The scheduling of shift drills has been restructured using the 3 month maximum time interval criteria.
- 4) The affected departments have been notified of the new drill schedules requirements.
- 5) Full compliance for Item 4 above was achieved by April 30, 1986.

FINDING 3:

Technical Specification Section 4.15.4.a.1 requires those stations in the vicinity of safety-related equipment to be demonstrated operable by a monthly visual inspection of hose station equipment.

Contrary to the above, the fire hose stations were not inspected in September 1985 and the time between the August 27 and October 8, 1985 inspection was 42 days. This exceeded the maximum of 39 days (31 days plus 25%) permitted by the Technical Specifications.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) Periodic performance of the inspection procedure was triggered by a computer generated projection of maintenance/inspection activities. The reason for the finding was in that planning personnel incorrectly established the inspection schedule in this case. This oversight allowed the Technical Specification surveillance interval to be exceeded in this instance.
- 3) The planning personnel have been instructed to manually issue the surveillance on the first day of each month until revisions are made to the computerized preventative maintenance program.
- 4) The computerized preventative maintenance program is being revised. This revision will include the ability to issue the surveillance by calendar day.
- 5) Full compliance for Item 4 above is scheduled to be achieved by September 5, 1986.

