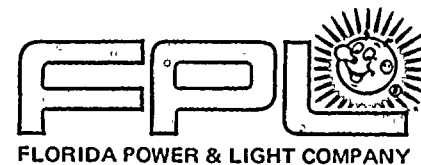


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MAY 29 1988  
L-86-228

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 250-86-06 and 251-86-06

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

There is no proprietary information in the report.

Very truly yours,

  
for C. O. Woody  
Group Vice President  
Nuclear Energy

COW/JA/SAV:de

Attachment

cc: Harold F. Reis, Esquire  
PNS-LI-86-172

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PEOPLE...SERVING PEOPLE

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Re: Turkey Point Units 3 and 4  
Docket No. 50-250, 50-251  
IE Inspection Report 250-86-06 & 251-86-06

FINDING 1:

Title Ten, Code of Federal Regulations, Part 50, Appendix B, Criterion V requires activities affecting quality be accomplished in accordance with documented procedures containing appropriate acceptance criteria. American Society of Mechanical Engineers Boiler and Pressure Vessel (ASME B&PV) Code Section XI, 1980 through winter 1981 addenda Paragraph IWP-3111, requires that new reference values be determined or previous values be verified by an inservice test run when a reference value or a set of values may have been affected by repair of a pump. FP&L Procedure OP-4004.1 has been identified as the applicable procedure for Testing Containment Spray Pump 4B as required by ASME B&PV Code Section XI.

Contrary to the above, Procedure OP-4004.1 did not contain appropriate acceptance criteria in that, after a repair to the 4B Containment Spray Pump, which reduced the vibration values by a factor of three, the reference value for vibration and the associated acceptance criteria in Procedure OP-4004.1 were not amended to reflect the lower vibration values obtained during the post repair test.

RESPONSE:

FPL does not concur with the finding for the following reasons:

- 1) It is FPL's position that paragraph IWP-3111 requires a new set (or sets) of reference values be determined after a pump has been replaced. However, after completion of repairs or routine servicing of a pump, which may have affected a pump reference value (or sets of values), paragraph IWP-3111 requires that either the previous set (or sets) of reference values shall be reconfirmed, or a new set (or sets) shall be determined by an inservice test run prior to, or within 96 hours after the pump is returned to service.

The acceptance criteria for reconfirming the previous set (or sets) of reference values is provided in Table IWP 3100-2.

- 2) Subsection IWP "Inservice Testing of Pump in Nuclear Power Plants" is based in part on statistical techniques for the analysis of test data. Table IWP-3100-2 "Allowable Ranges of Test Quantities" provides ranges of inservice test quantities in relation to reference values. Vibration amplitude has four (4) ranges of Test Quantity specified, depending on the reference vibration amplitude value. Accordingly, a change in pump vibration amplitude from 1.5 mil to 0.5 mil in the range 0.5 to 2.0 mil is not by itself statistically significant and did not require a change in reference value. Furthermore, statistical analysis of No. 4B containment spray pump inservice test results from 1977 to date show that a test quantity of 0.5 mil is within one standard deviation of the median value for vibration amplitude for this pump and is well within the vendor recommended value.

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