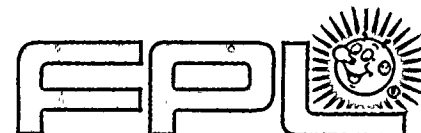


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FLORIDA POWER & LIGHT COMPANY

MAY 28 1988

L-86-221

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 250-86-17 & 251-86-17

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,

[Signature]
for C. O. Woody
Group Vice President
Nuclear Energy Department

COW/JA/ms
Attachment

cc: Harold F. Reis, Esquire

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Q PDR

PEOPLE...SERVING PEOPLE

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ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket No. 50-250, 50-251
IE Inspection Report 250-86-17 & 251-86-17

FINDING:

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 A:

Appendix A of USNRC Regulatory Guide 1.33 states that written procedures should be established covering plant operation from cold shutdown through power operation.

Operating Procedure 0202.2, Unit Startup - Hot Standby to Power Operation, revision dated March 7, 1986, requires, in section 5.7, that the demineralized water system and heater drain pumps be aligned or be verified to have been aligned in accordance with procedures O-OP-018 and 3-OP-081, respectively.

Administrative Procedure O-ADM-201, Upgrade Operations Procedure Usage, revision dated December 4, 1985, requires, in section 5.1.3.3, that procedurally specified valve alignments must be completed following a major plant outage exceeding 30 days duration. For shorter outages, systems can be verified to be properly aligned by ensuring that a completed current valve alignment is on file.

Contrary to the above, between April 8-10, 1986, procedures OP 0202.2 and O-ADM-201 were not properly implemented, in that, following an outage of greater than 30 days duration, the demineralized water system alignment was not performed and the heater drain pump alignment, although performed, was not reviewed by a supervisor, as required.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The two systems in question Demineralized Water System and Heater Drain Pumps were not completed due to an oversight. The systems were in service and alignment verified immediately after being brought to the attention of the Plant Supervisor - Nuclear (PS-N). It should be noted that the Heater Drain Pump procedure was completed but not signed off by the PS-N and the Demineralized Water System paper work was lost and the system reverified to ensure proper documentation.

- 3) A discussion was held with the Plant Supervisors Nuclear and Nuclear Watch Engineers involved on the importance of verifying and documenting related system status.
- 4)
 - a) The Plant Manager - Nuclear has re-issued a letter to nuclear plant personnel to stress the importance of verbatim compliance and strict procedural compliance.
 - b) OP 0202.2 and OP 0202.1, Unit Startup - Cold Condition to Hot Standby Conditions, have been revised to clarify the related system status requirements.
- 5)
 - a) Full compliance for Item 3 above was achieved on April 23, 1986.
 - b) Full compliance for Item 4.a above was achieved on April 14, 1986.
 - c) Full compliance for Item 4.b above was achieved on May 1, 1986.

FINDING B:

Appendix A of USNRC Regulatory Guide 1.33 states that administrative procedures specifying procedure adherence should be established.

Administrative procedure O-ADM-201, Upgrade Operations Procedure Usage, revision dated December 4, 1985, requires, in section 5.5.1, that operating procedures be followed exactly and that all personnel comply with approved procedures applicable to the activity or circumstance being performed.

Operating Procedure 0202.2, Unit Startup - Hot Standby to Power Operation, revision dated March 7, 1986, requires, in step 8.71, that the turbine runback defeat switch, enabling a turbine runback subsequent to loss of a main feed pump, be placed in the normal position. Completion of the step is certified by the control room operator when he/she initials the space provided.

Contrary to the above, on April 9, 1986, the control room operator failed to properly implement step 8.71 of OP 0202.2, in that, instead of placing the turbine runback defeat switch in the normal position and initialling the space provided, he omitted the step, indicating, in the space provided, that completion was not applicable.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The step was omitted by the Reactor Control Operator as an oversight. It should be noted that the switch was in the correct position during the startup of the unit.

Re: IE Inspection Report 250-86-17 & 251-86-17

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- 3) A discussion was held with the Plant Supervisor - Nuclear and Nuclear Watch Engineer involved on the importance of performing required procedure steps.
- 4)
 - a) The Plant Manager - Nuclear has re-issued a letter to nuclear plant personnel to stress the importance of verbatim compliance and strict procedural compliance.
 - b) OP 0202.2 has been revised to clarify the step in question.
- 5)
 - a) Full compliance for Item 3 above was achieved on April 23, 1986.
 - b) Full compliance for Item 4.a above was achieved on April 14, 1986.
 - c) Full compliance for Item 4.b above was achieved on May 1, 1986.

10-1-10

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