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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
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 RECIP. NAME RECIPIENT AFFILIATION
 MCDONALD, D. G. PWR Project Directorate 2

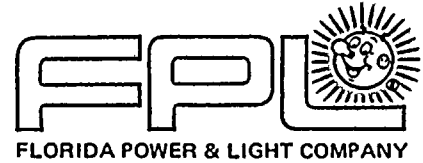
SUBJECT: Responds to NRC 860430 request for addl info re Generic Ltr
 83-28, Item 3.1.2, "Post-Maint Testing (Reactor Trip Sys
 Components)" & Items 3.2.1 & 3.2.2, "Post-Maint Testing (All
 Other Safety-Related Components)."

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Office of Nuclear Reactor Regulation
Attention: Mr. D. G. McDonald, Project Manager
PWR Project Directorate #2
Division of PWR Licensing - A
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

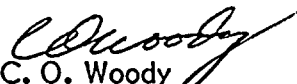
Dear Mr. McDonald:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Request for Additional Information
Generic Letter 83-28, Items 3.1.2, 3.2.1 and 3.2.2
NRC TAC Nos. 52972, 52973, 53809 and 53810

Attached is Florida Power & Light Company's response to your April 30, 1986 request for additional information regarding Generic Letter 83-28, Item 3.1.2, "Post-Maintenance Testing (Reactor Trip System Components)", and Items 3.2.1 and 3.2.2, "Post-Maintenance Testing (All Other Safety-Related Components)."

If you have any further comments, please call us.

Very truly yours,


C. O. Woody
Group Vice President
Nuclear Energy

COW/TCG/gp

Attachment

ccc: Dr. J. Nelson Grace, Region II, USNRC
Harold F. Reis, Esquire

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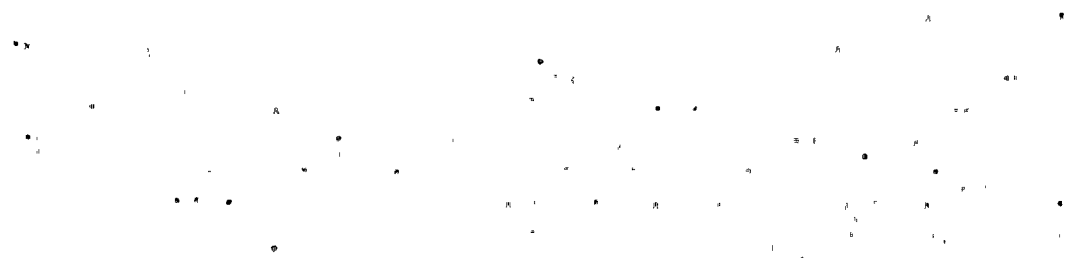
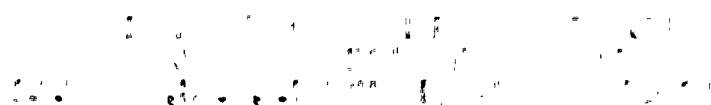
REQUEST FOR ADDITIONAL INFORMATION
TURKEY POINT UNITS 3 AND 4
GENERIC LETTER 83-28, ITEMS 3.1.2, 3.2.1, AND 3.2.2

A. Item 3.1.2 - Check of Vendor and Engineering Recommendations for Testing and Maintenance (Reactor Trip System)

You indicated, in your response, that vendor information concerning reactor trip system components is obtained from Westinghouse. You also state that vendor recommendations have been incorporated into Turkey Point procedures; however, it is not quite clear from the response whether this review action entailed a review or re-check of previous vendor and engineering recommendations and comparison with current procedures to ensure that appropriate test guidance is included in applicable procedures or the Technical Specifications. If your re-evaluation of your review process and records does not adequately verify that appropriate vendor and engineering recommendations have been incorporated into current test and maintenance procedures, you need to provide an unambiguous statement confirming that the requirements of Action Item 3.1.2 have been completed, and that the post-maintenance testing will verify component capability to perform its safety functions. If your re-evaluation does not confirm an adequate review, you should submit a schedule for when this review will be completed or justification for not performing a re-review.

Response

Reviews were performed following the receipt of generic letter 83-28. Incorporation of recommendations included the addition of the reactor trip breaker shunt trips as an example. However, based on your inspection findings, NRC Report Nos. 50-250, 251/85-40 and 85-32, the Reactor Protection System (RPS) is in the process of a complete design review as a Select System. This re-review will ensure that engineering recommendations for testing and maintenance of the reactor trip system have been incorporated into current test and maintenance procedures. This re-review of the Reactor Trip System will be completed by June 1987.



B. Item 3.2.1 - Review of Test and Maintenance Procedures and Technical Specifications (All Other Safety-Related Components)

It was concluded from review of your submittal dated November 8, 1983, that you have several Administrative Procedures which require the post-maintenance testing be performed and that maintenance instructions and plant work orders contain requirements for post-maintenance operation testing of safety related structures, systems, and components prior to the equipment being returned to service. It is also understood that the procedures require maintenance requests and plant work orders to be reviewed by the responsible sections prior to the performance of maintenance to assure that post-maintenance testing is specified, if required. Also, documents to further assure that testing has been performed. However, it could not be determined from your response whether the maintenance procedures, Technical Specifications, and post-maintenance test procedures were actually re-reviewed to determine if testing was specified and if the testing adequately demonstrates the safety related components are capable of performing their intended safety functions. Based on NRC inspection findings, reported in NRC Report Nos. 50-250, 251/85-40 and 85-32, it appears that programs may be weak and not being fully implemented to assure adequate post-maintenance testing is accomplished. In addition, the programs in place do not encompass all disciplines and types of maintenance, including troubleshooting. Considering the above, you need to submit an unambiguous statement confirming that post-maintenance testing is specified and that the procedures were adequately reviewed to ensure that the testing adequately verifies component capability to perform all safety functions. If a re-review was not performed, you should submit a schedule for when this will be completed or a justification for not performing a re-review.

Response

Maintenance procedures were reviewed to assure post-maintenance testing would be required, however, as your inspection report indicated, a re-review is necessary. A direct response to NRC Inspection Report No. 50-250, 251/85-40 and 85-32 was the start of the Select System Review. The Select System Review will determine and ensure that testing which is specified in the Technical Specifications and post-maintenance procedures adequately verifies component capability to perform all safety functions. This re-review will be completed by June 1987. In addition, the Analytical Based Preventive Maintenance Program (ABPM) will re-review existing maintenance procedures to assure correct post-maintenance testing. This program will be complete by December 1989.

A large, dense, black and white abstract pattern resembling a microscopic view of a textured surface or a high-contrast, noisy image. The pattern consists of numerous small, dark, irregular shapes and speckles distributed across a lighter background, creating a complex, granular texture.

A large, dense, black and white photograph of a vast, flat landscape, likely a desert or tundra. The surface is covered with numerous small, dark, irregular shapes, possibly rocks or debris, scattered across the terrain. The overall texture is grainy and high-contrast, with a lot of detail visible in the foreground and middle ground. The horizon is not clearly defined, suggesting a very flat and expansive area.

C. Item 3.2.2 - Check of Vendor and Engineering Recommendations for Testing and Maintenance (All Other Safety-Related Components)

You indicated that a review of Westinghouse Technical Bulletins, vendor manuals, engineering recommendations and other industry information systems was required by procedures and that applicable information was subsequently entered into the FPL Operating Experience Program for tracking and implementation. However, it is not clear from this response whether you performed a review which entailed a check of vendor and engineering recommendations against your procedures to ensure that appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications. If a review was performed and adequately verified that appropriate vendor and engineering recommendations have been incorporated into test and maintenance procedures for safety-related components, you need to provide an unambiguous statement confirming that the requirements of Action Item 3.2.2 have been completed. If not, you should submit a schedule for when this review will be complete.

Response

A review was performed of existing vendor information. However, this review indicated that our vendor manuals were not maintained, not up to date and not complete. Power Plant Engineering has a program in place (to be completed by December 1986) that requires vendor manuals to be updated. After that date, vendors will be required to provide updates every six (6) months. The re-review that will follow the manual update will be completed by June 1987. The re-review of the vendor manuals and Engineering recommendations will be followed by incorporation of vendor and Engineering recommendations for testing and maintenance into the test and maintenance procedures. Engineering recommendations will be reviewed by the Select Systems Reviews.

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