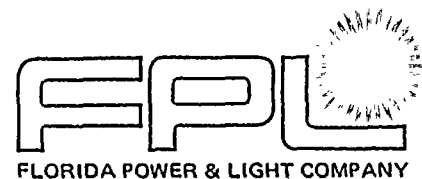


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L-86-344

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 250-86-18 & 251-86-18

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, .

*H. J. Bourne*

*for*  
C. O. Woody  
Group Vice President  
Nuclear Energy Department

COW/JA/ms  
Attachment

cc: Harold F. Reis, Esquire

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## ATTACHMENT

Re: Turkey Point Units 3 and 4  
Docket No. 50-250, 50-251  
IE Inspection Report 250-86-18 & 251-86-18

### FINDING:

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

Appendix A recommends, in part, that administrative procedures, maintenance procedures and procedures for the operation of safety systems should be covered.

Contrary to the above, written procedures were not established or implemented as specified in the following examples:

### FINDING A:

An adequate procedure for motor operated valve maintenance was not established in that temporary operating procedure 166 and procedure O-CME-102.1 specified incorrect torque switch settings for limitorque valve motors.

### RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was that O-CME-102.1 was based on the information in Temporary Operating Procedure (TOP) 166. The information in TOP-166 was the original valve torque settings. However, Plant Change/Modifications (PC/Ms) 83-128 and 83-129 installed new operators with new switch settings which were not incorporated into TOP-166 and, therefore, did not get incorporated into O-CME-102.1.
- 3) Two On-The-Spot Changes (OTSCs) were generated for O-CME-102.1 to correct the torque settings for the valves to agree with their bill of materials.
- 4) Maintenance procedure writers will be instructed to review PC/Ms to identify any required changes to the new format maintenance procedures being written as a part of the Performance Enhancement Program.
- 5) a) Full compliance for Item 3 above was achieved by May 23, 1986.  
b) Full compliance for Item 4 above will be achieved by September 2, 1986.

FINDING B:

The normal operating procedure (OP-3400.1) for the Intake Cooling Water system requires valve HT-342 (Lube Water Supply Gauge Isolation) to be closed. During a walkdown of the system during this inspection, the valve was found in the open position with no documentation supporting the valve being out of its normal position.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was that OP 3400.1 incorrectly required this valve to be closed. This is the root valve for back up lube water to the Intake Cooling Water pumps. This valve should be open so that back up lube water pressure can be monitored. Training drawing 5610-T-E-4065, Sheet 1, correctly shows this valve as open.
- 3) OP 3400.1 has been replaced by 3(4)-OP-019, Intake Cooling Water System, which has upgraded the original procedure to the new Procedure Upgrade Group format to enhance its usage and human factors aspect. The correct position of 3(4)-50-342 has been placed in 0-OP-012, Service Water Operating Procedure, and 3(4)-OP-019 requires the service water system to be in operation or operable as part of the prerequisites.
- 4) The Procedure Upgrade Program is currently revising the existing plant procedures to enhance their usability and upgrading them to the new procedure format. The completion of this item is currently under the schedules and controls of the Performance Enhancement Program.
- 5) Full compliance for Item 3 above was achieved by July 15, 1986.



FINDING C:

The Component Cooling Water (CCW) system normal operating procedure (OP-030) requires valve 711B to be open. Contrary to this, the valve was found closed during a system walkdown using the procedure again with no supporting documentation.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) Valve 711B was closed because the downstream valve (MOV-832) was leaking by its seat. An information tag had been placed in the control room adjacent to the control room switch for MOV-832 alerting the operators to this condition. However, an information tag had not been placed in the field on valve 711B.
- 3) An operator information tag was hung in the field on valve 711B to inform the field operators of the reason for 711B being closed.
- 4) The Operations Department has evaluated the administrative controls in place by which plant personnel are made aware of unusual conditions of plant equipment. The results of their review have determined that AP 0103.36, Control of Operator Aids and Temporary Information Tags, provides the appropriate administrative controls for temporary deviations from normal system line ups. Operations personnel will be informed of the requirements of AP 0103.36, emphasizing the need to comply with these requirements.
- 5) a) Full compliance for Item 3 above was achieved by April 11, 1986.  
b) Full compliance for Item 4 above will be achieved by August 31, 1986.

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FINDING D:

The Unit 4 Equipment Out of Service (E00S) log is required to be fully inservice after the unit is returned to a Cold Shutdown condition from a Refueling Shutdown condition pursuant to administrative procedure AP-0103.2. Contrary to this, the 4A CCW heat exchanger was not logged in the E00S log while Unit 4 was in cold shutdown; yet the heat exchanger was tagged out per tagout 86-2-142, and both heat exchanger heads were removed, rendering the heat exchanger inoperable during this period of time.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The E00S book was not fully reinstated upon returning to cold shutdown due to an oversight.
- 3) AP 0103.2 has been revised to require the E00S book to be fully maintained in all modes of operation.
- 4) A training report was issued on May 11, 1986 to licensed personnel to make them aware of this procedure change and the new requirements for the E00S book.
- 5) Full compliance for Item 3 above was achieved on April 29, 1986.



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