

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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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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 WOODY, C. O. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
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SUBJECT: Forwards revised response to violation Example E.2 in Insp  
 Repts 50-250/86-33 & 50-251/86-33.

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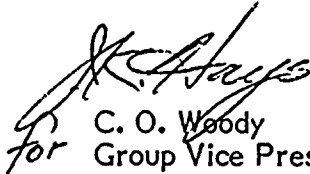
Gentlemen:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inspection Report 86-33

Florida Power & Light Company has reviewed your evaluation of our original response to violation example E.2 and a revised response is attached.

There is no proprietary information in the report.

Very truly yours,

*for* 

C. O. Woody  
Group Vice President  
Nuclear Energy Department

COW/SDF/gp

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

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PDR ADOCK 05000250  
Q PDR

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## ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4  
DOCKET NO. 50-250, 50-251  
IE INSPECTION REPORT 250-86-33 & 251-86-33

### RESTATEMENT OF THE VIOLATION EXAMPLE E.2

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 Appendix A of USNRC Regulatory Guide 1.33. Appendix A of USNRC Regulatory Guide 1.33 specifies that procedures be established describing operation of the shutdown cooling system.

AP 0103.32, Reactor Cold Shutdown Conditions, Revision dated June 3, 1986, requires, in section 4.10, that the components of at least one Residual Heat Removal (RHR) loop be capable of being powered from an operable Emergency Diesel Generator (EDG).

Contrary to the above, between July 20 - 25, 1986, the components of at least one RHR loop were not capable of being powered from an operable EDG.

### RESPONSE TO STAFF ASSESSMENT OF ORIGINAL FPL RESPONSE

- 1) FPL has reviewed the NRC assessment of our original response and has decided not to pursue further NRC reconsideration of this issue. In reviewing your assessment, we concur with your determination that a Technical Specification (TS) violation did not occur and that the event was of minor safety significance, since the plant was maintained in a cold shutdown condition as required.
- 2) The reason for the finding was an interpretation of the requirements of AP 0103.32 for RHR loop operability. AP 0103.32 was revised to enhance the operability requirements for RHR loops by specifying the support systems required to be operable when a RHR loop was required to be operable by TS. It is FPL's position that a normal line-up during cold shutdown conditions does, in fact, include a RHR loop with associated components. This is a matter of common practice and acceptable operation at cold shutdown. Such action is not intended to restrict maintenance activities during cold shutdown periods. We stated in our original response that the purpose of AP 0103.32, step 4.10, was to clarify the operability requirements for a RHR loop and not specifically to require a loop to be operable. In addition, the guidelines provided in AP 0103.32 were developed to administratively control shutdown cooling in accordance with our TS which allow the use of two (2) out of five (5) coolant loops.



In comparing the RHR loops and RCS loops with emergency power capability, the obvious difference is the fact that reactor coolant pumps (RCPs) are not provided with emergency power, but instead, the requirement to have operable steam generators with a minimum of 10% level in the secondary side, provide the capability to remove residual heat in the case of a loss of offsite power.

- 3) At the time of this event, Unit 3 just had been placed in cold shutdown to complete various modifications to enhance EDG loading. Unit 4 was still in an extended refueling/maintenance outage that had begun in the middle of January, 1986. Therefore, Unit 4 had been in cold shutdown for approximately 6 months and had approximately 1/3 of the fuel assemblies in the core replaced with fresh non-irradiated fuel. In this condition, the amount of decay heat in the RCS was minimal. Based on the above, it was decided to take the B EDG out of service to implement a modification to the EDG fuel transfer system. This modification was required to enhance the operability of the EDGs and reduce the risk of EDG overloading. During this period, the 4B RHR pump was maintained in operation. In addition, one reactor coolant loop was in operation and a second operable, except for the time frame where maintenance was required on the 4A RCP Oil Lift Pump. The second reactor coolant loop was returned to operable status in approximately 3.5 hours. The B EDG was placed back in service on July 25, 1986, which restored the emergency power supply to the 4B RHR loop as specified by AP 0103.32.
- 4) AP 0103.32 was reviewed and revised to clarify the requirements for RHR loop operability.
- 5)
  - a) Full compliance for item 3 above was achieved on July 25, 1986.
  - b) Full compliance for item 4 above was achieved on September 18, 1986.