

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8801260110 DOC. DATE: 88/01/19 NOTARIZED: NO DOCKET #
 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
 AUTH. NAME AUTHOR AFFILIATION
 WOODY, C. O. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in IE Insp Repts 50-250/87-46 &
 50-251/87-46. Corrective actions: Valve removed, evaluation
 performed, Procedure AP 0103.34 revised & time tag installed.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-2 PD	1 1	McDONALD, D	2 2
INTERNAL:	AEOB	1 1	DEBRO	1 1
	NRR MORISSEAU, D	1 1	NRR/DLPQ/PEB	1 1
	NRR/DOEA DIR	1 1	NRR/DREP/EPB	1 1
	NRR/DREP/RPB	2 2	NRR/DRIS DIR	1 1
	NRR/PMAS/ILRB	1 1	DE LIEBERMAN, J	1 1
	OGC/HDS2	1 1	<u>REG FILE</u>	1 1
	RES/DRPS DIR	1 1	RGN2 FILE 01	1 1
EXTERNAL:	LPDR	1 1	NRC PDR	1 1
	NSIC	1 1		

FPL

JANUARY 19 1988

L-88-27

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Inspection Report 87-46

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

Very truly yours,


C. O. Woody
Executive Vice President

COW/SDF/gp

Attachment

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

8801240110 880119
PDR ADCK 05000250
Q PDR

SDF/IR.004

Handwritten initials: JEP/11

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NO. 50-250, 50-251
IE INSPECTION REPORT 250-87-46 & 251-87-46

FINDING A:

Technical Specification 6.8.1 requires that written procedures shall be established and implemented for activities recommended in Appendix A of Regulatory Guide 1.33. Appendix A, recommends, in part, that procedures for the operation of safety related systems should be established.

Operations Procedure 4-OP-64, entitled Safety Injection Accumulators, revision dated September 22, 1987, requires, in Attachment 2 that the manual isolation vent valve 4-937 be in the open position.

Contrary to the above, on October 25, 1987, valve 4-937 was found not to be in the open position.

RESPONSE A:

- 1) FPL concurs with the finding.
- 2) The reason for the violation is most probably the combination of two personnel errors. Performance of procedure 4-OP-064 is required prior to entry into mode 2. This procedure verifies proper valve position for valve 4-937. Procedure 4-OP-064 was last performed on June 28, 1987, prior to unit 4 criticality on July 8, and verified that valve 4-937 was open. No work which required valve 4-937 to be in the closed position was performed between the performance of 4-OP-064 on June 28 and October 25, 1987. A probable contributor to the event was a component ID tag which was attached to this valve. The tag improperly identified the valve as being normally closed. The incorrect tag was installed in April 1986. The tagging program has implemented significant enhancements since that time. The likely reason for the closure of valve 4-937 was that the valve operator was inadvertently stepped on. The valve is a globe valve with a quarter-turn required to fully close it. The conclusion that the valve was stepped on was based on the fact that the valve operator was bent such that it could not fully open.
- 3) Valve 4-937 was immediately opened.
- 4) a) Valve 4-937 was removed. An evaluation was performed to determine the function of the valve. The evaluation determined that no credit is taken for this valve for venting the accumulators.

- b) Procedure AP 0103.34, "Component Labeling and Tagging", was revised on February 24, 1987. The revised procedure assures that the information on the tags is accurate by requiring the following:

Prior to tags being ordered, the applicable drawings, procedures, and other reference materials are reviewed to establish the accuracy of the information which is to be printed on the tag.

At the time the tag is installed, the above verification is performed independently by the tag installer. Any identified discrepancies are required to be evaluated and resolved at this time.

In an effort to further enhance the plant tagging program, procedure ADM-209, "Equipment Tagging" revised and replaced procedure AP 0103.34 on December 4, 1987.

- c) A letter addressing the need for care to assure that valve position is not changed accidentally will be issued to plant personnel.
- 5) a) Full compliance for item 3 above was achieved by October 25, 1987.
- b) Full compliance for item 4a above was achieved by November 13, 1987.
- c) Full compliance for item 4b above was achieved by February 24, 1987.
- d) Full compliance for item 4c above will be achieved by February 15, 1988.