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SUBJECT: Responds to violations noted in Insp Repts 50-250/87-54 & 50-251/87-54.

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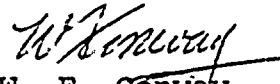
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Attn: Document Control Desk
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Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Reply to Notice of Violation
Inspection Report 87-54

Florida Power & Light Company has reviewed the subject inspection report and a response is attached. Our response to Finding A.3 will be submitted April 25, 1988.

Very truly yours,


W. F. Conway
Acting Group Vice President
Nuclear Energy

WFC/SDF/gp

Attachment

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

SDF/026.IR

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ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NO. 50-250, 50-251
IE INSPECTION REPORT 250-87-54 & 251-87-54

FINDING A:

10 CFR 50, Appendix B, Criterion III, as implemented by the approved Florida Power and Light Company Topical Quality Assurance Report (FPLTQAR) 1-76A, Revision 10, Topical Quality Requirement (TQR) 3.0, Revision 5, requires that the design changes be subject to design control measures commensurate with those applied to the original design and that these design control measures assure that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures, and instructions.

FPLTQAR 1-76A, Appendix C, Revision 7 specifically commits, with exceptions not relevant here, to American National Standards Institute (ANSI) N45.2.11-1974, Quality Assurance Requirements for the Design of Nuclear Power Plants, and to Regulatory Guide 1.64, Revision 2, Quality Assurance Requirements for the Design of Nuclear Power Plants, which endorses ANSI N45.2.11-1974. ANSI N45.2.11-1974 specifies that design activities be prescribed and accomplished in accordance with procedures of a type sufficient to assure that applicable design inputs are correctly translated into specifications, drawings, procedures, or instructions. Design changes must be justified and subjected to control measures commensurate with those applied to the original design.

Contrary to the above, in January 1988, inspections identified that the design inputs contained in Plant Change Modifications (PCMs) 85-175 and 85-176, had not been correctly translated into operating procedures and the system description, as demonstrated by the examples below.

FINDING A.1:

Units 3 and 4 Operations Surveillance Procedures (OSP) 3/4-OSP-075.3, both entitled AFW Nitrogen Backup System Low Pressure Alarm Setpoint and Leakrate Verification, Revisions dated November 5, 1987, were not revised to include appropriate maximum acceptance criteria for AFW nitrogen consumption rates that, if present, would have failed to meet the design basis requirement for 2 hours of system operation without operator action outside the control room.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) PC/Ms 85-175, and 85-176 extensively modified the AFW backup nitrogen system. As a result of these modifications, new operating surveillance procedures 3/4-OSP-075.6, Auxiliary Feedwater Train 1 Backup Nitrogen Test, and 3/4-OSP-075.7, Auxiliary Feedwater Train 2 Backup Nitrogen Test, were developed to perform a dynamic test of the AFW flow control valve operation using the backup nitrogen system. Since the PC/M addressed only consumption rates associated.

with dynamic testing, no changes were made to the static leak test values of 3/4-OSP-075.3. Although the plant continued to perform the static test procedure of 3/4-OSP-075.3, the dynamic test procedures, 3/4-OSP-075.6 and 3/4-OSP-075.7, have been in place since system turnover to test system acceptance. FPL acknowledges that the criteria of 3/4-OSP-075.3 did not meet the requirements of PCMs 85-175 and 85-176. However, except as noted in finding A.2 below, the criteria of 3/4-OSP-075.6 and 3/4-OSP-075.7 did meet the requirements.

- 3) Procedures 3/4-OSP-075.3 have been revised to delete the static nitrogen test and replace it with 3/4-OSP-075.6 and 3/4-OSP-075.7.
- 4) Appropriate procedure changes will be made to require the system engineer to review procedure changes resulting from the implementation of a PC/M.
- 5) a) Full compliance for item 3 above was achieved on April 5, 1988.
b) Full compliance for item 4 above will be achieved by June 30, 1988.

FINDING A.2:

Units 3 and 4 procedures 3/4-OSP-075.6,, both entitled Auxiliary Feedwater Train 1 Backup Nitrogen Test, revisions dated December 17, 1987, and Unit 3 and 4 procedures 3/4-OSP-075.7, both entitled Auxiliary Feedwater Train 2 Backup Nitrogen Test, revisions dated December 17, 1987, were revised to include incorrect and excessively high acceptance criteria for AFW system nitrogen consumption. Consequently, the procedures allowed consumption rates that, if present, would have failed to meet the design basis requirement for 2 hours of system operation without operator action outside the control room.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was that PC/Ms 85-175, and 85-176 did not provide clear and concise guidance for the acceptance criteria. This resulted in not adequately reflecting the PC/M design requirements into the appropriate surveillance procedures. Also the definition of automatic operation was not clearly identified in the procedure. These discrepancies led to the inaccurate surveillance procedures.
- 3) Surveillance procedures 3/4-OSP-075.6 and 3/4-OSP-075.7 were revised to correct the discrepancies in the consumption rates.
- 4) An investigation will be performed of this event to determine root cause and provide corrective actions to prevent recurrence. This report will be reviewed and corrective actions will be taken as required.
- 5) a) Full compliance for item 3 above was achieved by January 12, 1988.
b) Full compliance for item 4 above will be achieved by June 30, 1988.

FINDING A.3:

Off Normal Operating Procedure (ONOP) 0208.11, Annunciator Test Panel I, Station Service, Revision dated September 10, 1987, specified that upon receipt of a low pressure alarm, each of 5 nitrogen bottle outlet pressure gauges should be placed in service by opening their root valves. This was contrary to design requirements specified in PCMs 85-175 and 85-176, which specified that the local pressure indicators are not seismically qualified and will be normally isolated from the system.

RESPONSE:

- 1) FPL is currently reviewing our response to this finding. A response to this finding will be submitted by April 25, 1988.

FINDING A.4:

The AFW system description (SD) 117, revision dated December 10, 1987, and the plant Precautions, Limitations and Setpoints Document, revision 29, dated December 15, 1987, indicated that the low nitrogen alarm setpoint pressure was 1350 psig. However, changes made during the implementation of PCMs 85-175 and 85-176 modified the setpoint to 650 psig. Additionally, SD 117 was not updated to reflect extended AFW operation without required operator action outside the control room subsequent to receipt of the low nitrogen pressure alarm. SD 117 specified that only 10 minutes existed during which to provide additional nitrogen, a condition that existed before, but not after, the implementation of the PCMs.

RESPONSE:

- 1) FPL concurs with the finding.
- 2)
 - a) Subsequent changes to the subject PCMs did not identify the PLS as an affected document requiring an update.
 - b) The AFW system description (SD) 117 was updated (December 10, 1987) to incorporate PC/Ms 85-175 and 85-176. However, at the time of the inspection, changes made during the implementation of these PC/Ms had not yet been incorporated into the system description. These changes were in the Training System Action Request System (TSAR) and were being tracked for incorporation into the system description prior to the next teaching of that system description material. System descriptions are not used to operate or maintain the plant. Therefore, the Training Department establishes system description revision priorities based on the next scheduled use of the affected materials.
- 3)
 - a) The PLS document has been revised to reflect the new setpoints.
 - b) System description 117, Auxiliary Feedwater System, is being revised to incorporate the changes in the nitrogen backup system setpoints.
- 4)
 - a) The PCM procedure (administrative procedure 190.15) will be revised to identify the PLS document as an affected document requiring update whenever setpoint changes are required by a PCM and any subsequent revisions.



b) Training Department Administrative Guideline (AG) AG-20 provides a method to receive, evaluate, and track internal and external changes to training materials, including system descriptions. To facilitate this process, two actions have been taken: 1) Specific instructors will be assigned, as system experts, to maintain system descriptions current, and 2) One instructor will be designated as the system description coordinator with the responsibility of monitoring and tracking changes to system descriptions.

5) a) Full compliance for item 3.a above was achieved by March 31, 1988.

b) Full compliance for item 3.b above will be achieved by May 20, 1988.

c) Full compliance for item 4.a and 4.b above will be achieved by May 31, 1988.

FINDING B:

Technical Specification (TS) 6.8.1 requires that written procedures and administrative policies shall be established, implemented, and maintained to meet or exceed the requirements and recommendations of Appendix A of USNRC Regulatory Guide 1.33 and sections 5.1 and 5.3 of ANSI N18.7-1972.

FINDING B.1:

Regulatory Guide 1.33, Appendix A, item 8 specifies that surveillance procedures should be developed for the AFW system. Section 5.1.2 of ANSI N45.2-1972 specifies that procedures shall be followed.

Surveillance procedure 4-OSP-075.3, entitled AFW Nitrogen Backup System Low Pressure Alarm Setpoint and Leakrate Verification, revision dated November 5, 1987, requires, in step 7.2.20 that a nitrogen bottle be placed in service. This bottle is one of three bottles required to be aligned to the system. Administrative Procedure 0-ADM-031, entitled Independent Verification, revision dated February 10, 1987, specifies, in section 5.2.1.4 that independent verification be performed for manipulations which restore component normal alignment following surveillance testing.

Contrary to the above, on January 6, 1988, procedures 3/4-OSP-75.3 failed to establish administrative requirements to independently verify AFW nitrogen valve positions, which resulted in a failure to implement step 7.2.20 of procedure 4-OSP-075.3 in that a valve was not opened as required. Consequently, only two of three nitrogen bottles were restored to their normal alignment following surveillance testing.

RESPONSE:

1) FPL concurs with the finding.

2) The reason for the finding was personnel error in not following 3/4-OSP-075.3 properly and procedural inadequacies in that 3/4-OSP-075.3 did not have proper independent verification for some of the valve positions.

- 3) a) The person involved was counseled on his lack of attention to detail.
b) Operating surveillance procedures (OSP) 3/4-OSP-075.3 were revised to ensure proper independent verification of the valve position for the nitrogen bottles.
- 4) The AFW procedures were reviewed by the system engineer to determine if any other independent verification concerns existed. This review did not reveal any other deficiencies.
- 5) a) Full compliance for item 3 above was achieved on January 7, 1988.
b) Full compliance for item 4 above was achieved on April 11, 1988.

FINDING B.2:

Regulatory Guide 1.33, Appendix A, item 6.v specifies that procedures should be developed for combating emergencies and other significant events such as plant fires.

Administrative procedure (AP) 15500, entitled Fire Protection Program, revision dated December 8, 1987, section 9.4.1, requires in part that backup suppression be established as compensatory action during fire protection impairment of automatic fire suppression systems such as the halon system. Section 9.5.3 specifies, in part, that the posting of a continuous firewatch is an acceptable compensatory action when the halon system is impaired. Temporary procedure 347, entitled DC Equipment and Inverter Rooms Supplemental Cooling Monitoring and Standby Condition, revision dated June 25, 1987, section 5.1.1, requires that any time door 108A-1 is maintained open, a continuous firewatch shall be established to close the door (108A-1) within 60 seconds of the sounding of the halon activation alarm.

Contrary to the above, on January 12, 1988, the continuous fire watch posted at fire door 108A-1 to compensate for an impaired halon system was found asleep. Consequently, the effectiveness of the halon system might not have been re-established (through door closure) within the 60 second time interval.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was personnel error in that the fire watch person was not attentive to duty.
- 3) The fire watch person was replaced. In addition, the fire watch tour of duty was changed from one (1) hour to twenty (20) minutes.
- 4) The current vendor that supplies fire watch personnel will be replaced.
- 5) a) Full compliance for item 3 above was achieved on January 18, 1988.
b) Full compliance for item 4 above will be achieved by July 31, 1988.

FINDING B.3:

ANSI N18.7-1972, section 5.1.6.1 requires that maintenance that can affect the performance of safety-related equipment shall be properly pre-planned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances which conform to applicable codes, standards, specifications and criteria.

Contrary to the above, on January 13, 1988, maintenance was performed on the Unit 3 rod control system without documented instructions or drawings appropriate to the circumstances. Fuses were removed from the system without a complete understanding of what circuitry the fuses supplied. Consequently, portions of the rod control circuitry for 3 rods were de-energized while only one rod was thought to be affected. During a Unit 3 reactor shutdown, this unexpectedly resulted in multiple rods dropping into the core, requiring a manual reactor trip.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was personnel error in that the Instrument and Control Technician did not use a controlled drawing to ensure that removing the power fuses did not affect other equipment.
- 3) The technician involved and the Instrument and Control shop personnel have been counseled on the cause of this event and the need to ensure that the correct documentation is used when trouble shooting equipment.
- 4)
 - a) The non controlled labels on the rod control cabinets will be replaced.
 - b) The trouble shooting procedure will be clarified to ensure that proper wiring diagrams are consulted prior to lifting leads and removing fuses.
- 5)
 - a) Full compliance for item 3 above was achieved on February 16, 1988.
 - b) Full compliance for item 4 above will be achieved by May 31, 1988.

FINDING B.4:

AP 0109.3, revision dated August 6, 1987, entitled On the Spot Changes (OTSC) to Procedures, specifies, in section 5.9.2 that:

Licensed Operations personnel are responsible for handwriting the text of approved OTSCs into EOPs (emergency operating procedures), EPs (emergency procedures), and ONOPs (off normal operating procedures) within eight hours of approval.

Contrary to the above, on January 10, 1988, OTSC 5676 was approved to ONOP 0208.11, an annunciator response procedure, and as of January 13, 1988, it had not been entered into the ONOP.



RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was personnel error in that the personnel on shift did not properly implement the requirements of AP 0109.3.
- 3) A letter was issued to the Plant Supervisor - Nuclear which reemphasized the requirements of AP 0109.3 and who is responsible for the implementation of these requirements.
- 4) Figure 1 of AP 0109.3, OTSC change of intent guidelines checklist, has been revised to require a check off that this requirement is acknowledged and required to be implemented within eight (8) hours.
- 5) a) Full compliance for item 3 above was achieved on January 21, 1988.
b) Full compliance for item 4 above was achieved on February 18, 1988.