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50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
AUTH. NAME AUTHOR AFFILIATION
CONWAY, W. F. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC ltr re violations noted in Insp Repts
50-250/87-54 & 50-251/87-54. Corrective actions: gauges to be
in svc during off normal/emergency condition instead of
being isolated & Procedure ONOP 0208.11 revised.

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APRIL 25 1988

L-88-192

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
Reply to Notice of Violation
Inspection Report 87-54

Florida Power & Light Company has reviewed the subject inspection report and a response to Finding A.3 is attached. Our response to the remaining findings was submitted April 18, 1988.

Very truly yours,

W. F. Conway
for 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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an FPL Group company



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.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 concurs with the finding.
- 2) When ONOP 0208.11 was revised after implementation of PC/M 85-175 and 85-176, it was determined that it was more important to have the gauges in service during an off normal/emergency condition than to have them isolated. This was based on a review of PC/M 85-175 and 85-176 which stated that the "local pressure indicators be normally isolated from the system." Since ONOP-0208.11 delineates off-normal conditions, it was determined



that it was essential to provide the operators with the AFW backup nitrogen pressure information.

- 3) Procedure ONOP 0208.11 was revised upon identification of the concern to leave the non-seismic gauges isolated during off-normal conditions.
- 4)
 - a) Since this time the non-seismic gauges have been removed and seismic gauges were installed by PC/Ms 88-044 and 88-045, AFW Nitrogen Backup System, Pressure Indicator Replacement.
 - b) An investigation will be conducted of this event to determine root cause and provide appropriate corrective actions. This investigation will be reviewed and corrective actions taken as required.
- 5)
 - a) Full compliance for item 3 above was achieved by January 27, 1988.
 - b) Full compliance for item 4.a above was achieved by March 28, 1988.
 - c) Full compliance for item 4.b above will be achieved by May 27, 1988.

