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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

AUTH.NAME AUTHORITY AFFILIATION
 CONWAY,W.F. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 Document Control Branch.(Document Control Desk)

SUBJECT: Responds to violations noted in Insp Repts 50-250/88-02 &
 50-251/88-02.

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L-88-224
10 CFR 2.201

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 88-02

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

Very truly yours,

W. F. Conway

W. F. Conway
Senior Vice President - Nuclear

WFC/SDF/gp

Attachment

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

SDFNOV.IR

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PDR ADOCK 05000250
Q DCD

an FPL Group company

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ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NO. 50-250, 50-251
IE INSPECTION REPORT 250-88-02 & 251-88-02

FINDING:

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 A:

ANSI N18.7-1972, Section 5.1.2, requires that procedures shall be followed; and the requirements for use of procedures shall be prescribed in writing.

FINDING A.1:

Administrative Procedure 0103.41, entitled Caution Tag Clearance Procedure, revision dated December 11, 1986, specifies that caution tags are used to identify unusual conditions or precautions that are required to be taken when operating equipment during unusual conditions. Caution Tag 2-1-88-1 was originated on February 2, 1988. It required that Unit 3 valve 3-50-449 be maintained open to prevent Differential Pressure Indication (DPI) 3-1402 from indicating off-scale high. The tag specified that the valve could be closed after Intake Cooling Water (ICW) strainer 1402 was cleaned.

Contrary to the above, on February 5, 1988, valve 3-50-449 was found closed and ICW strainer 1402 had not been cleaned. Consequently, DPI 3-1402 was reading off-scale high.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was personnel error, in that the requirements of AP 0103.41 were not followed when valve 3-50-449 was closed. The investigation of the event could not determine the individual responsible for the valve manipulation.
- 3) Upon identification to FPL of the closed valve, the valve was promptly reopened.
- 4) a) Operations Management has been holding meetings with the operating crews to discuss their expectations on work controls, attention to detail during clearance boundary tag implementations, and procedure line up performance. Another concern being discussed is conditions in the plant which lead to error; system configuration, excessive frequency of testing/system manipulation and routine work practices. These meetings are being held to re-emphasize to operations personnel the importance of job performance and the up front early identification of operational problems that could lead to errors or equipment malfunction.



b) A letter has been issued by the Plant Manager-Nuclear discussing this event and the importance of procedural compliance with AP 0103.41. This letter re-emphasizes to personnel that caution tags are used to call attention to the existence of unusual circumstances and provide special instructions to prevent equipment damage and/or personnel injury due to abnormal system alignments or configurations and as such shall be followed verbatim. This letter will be discussed in the next round of safety meetings to re-emphasize to plant personnel the significance of this occurrence and importance of procedural compliance.

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

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

FINDING A.2:

Administrative Procedure O-ADM-503, entitled Control and Use of Temporary System Alteration, revision dated February 9, 1988, specifies that temporary system alterations be controlled by requiring that they be identified, reviewed, approved, documented and periodically reassessed. Section 4.1.2 specifies that an alteration includes removal of components within a system such that the design or configuration is changed.

Contrary to the above, prior to March 1987, two Unit 3 flow indicators, FI-3-1407 and FI-3-1409, were removed from the ICW system without administrative authorization. They remained absent until February 1988, when FI-3-1407 was reinstalled and temporary system alteration controls were imposed on the removal of FI-3-1409.

RESPONSE:

1) FPL concurs with the finding.

2) An investigation into this finding could not locate any work order or other document authorizing removal of the flow indicators. The cause for the removal of the flow indicators has remained indeterminate.

3) a) Flow indicator (FI-3-1407) was found and reinstalled.

b) The ICW flow indicators on Unit 3 were replaced under plant work order (PWO) 6827 and the similar flow indicators on Unit 4 were replaced under PWO 7123.

4) A letter from the Plant Manager-Nuclear will be issued to plant personnel emphasizing the unacceptability of making unauthorized system alterations.

5) a) Full compliance for item 3.a above was achieved by February 21, 1988.

b) Full compliance for item 3.b above was achieved by April 30, 1988.

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



FINDING B:

Appendix A, of Regulatory Guide 1.33, specifies that procedures should be developed for the operation and surveillance of service water systems.

Operations Surveillance Procedure 0-OSP-201.4, entitled Auxiliary Nuclear Plant Operator (ANPO) Daily Logs, revision dated November 17, 1987, specifies an acceptance criterion of 17 to 50 pounds per square inch gauge (psig) for the discharge pressure of each Intake Cooling Water (ICW) pump.

Contrary to the above, procedure 0-OSP-201.4 was not adequate, in that it contained non-conservative acceptance criteria. If ICW pump discharge pressure exceeded approximately 40 psig then system flow would not have been sufficient to meet design basis assumptions.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason procedure 0-OSP-201.4 was not adequate in regard to the non-conservative acceptance criteria for ICW pump discharge pressure is that the criteria bases were not adequately reviewed when procedure 0-OSP-201.4 was initially approved in March, 1987. The expanded range was transferred from the old format logsheets where it had been added to allow for increased system pressures anticipated as a result of valve alignment changes required by the Justification for Continued Operation (JCO) and 10 CFR 50.59 Evaluation Relating to emergency diesel generator (EDG) loading for One Unit Operation, JPE-L-86-59, which stated, "ICW/CCW flow shall be throttled to the components in service until the individual pump loads do not exceed 209 and 291 kW respectively." The expanded range was originally provided as a guideline based on operator experience rather than as an acceptance criteria based on engineering analysis.
- 3) A revision to procedure 0-OSP-201.4 was initiated on April 5, 1988 by the ICW system engineer which revises the ICW pump discharge pressure acceptance criteria to a new range based on pump curves and system design bases. This revision was reviewed by the Plant Nuclear Safety Committee (PNSC) 88-089 and approved by the Plant Manager-Nuclear on April 29, 1988. This revision will be issued for plant use by May 31, 1988.
- 4) Although this incident is regarded as an isolated case, the Procedure Upgrade (PUP) Group has re-emphasized their policy to address questions and concerns about acceptance criteria in procedures by identifying them to the appropriate system engineer for resolution.
- 5)
 - a) Full compliance for item 3 above will be achieved by May 31, 1988.
 - b) Full compliance for item 4 above was achieved by May 12, 1988.