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SUBJECT: Responds to violations noted in Inps Repts 50-250/88-01 & 50-251/88-01.

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FPL

JULY 26 1988

L-88-321

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 88-01

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

Very truly yours,

W 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

SDF.IR

IE01
1/1

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NO. 50-250, 50-251
IE INSPECTION REPORT 250-88-01 & 251-88-01

FINDING A:

10 CFR 50.47 (b)(9) requires that adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

Turkey Point Emergency Plan, Section 1.4, Concept of Operations, Page 1-7, dated November 1, 1986, states that "... FPL maintains adequate facilities and equipment for detecting, assessing, and responding to emergencies."

Emergency Procedure 20126, Offsite Dose Calculations, dated October 25, 1985, requires that 15 minute averages of meteorological data from the Primary and Backup Meteorological Towers be used to determine the meteorological conditions for the calculations of offsite doses.

Contrary to the above, the licensee's offsite dose assessment calculations could be inaccurate and could result in significantly non-conservative dose estimates in the event of a radioactive release for the following reasons:

FINDING A.1:

Required time-averaged (15 minutes averaged) meteorological data for use in Method 1, Table 1 of Emergency Procedure, "Offsite Dose Calculation," dated October 25, 1985, were not being used.

RESPONSE:

1) FPL concurs with the finding.

2) Cognizant personnel believed that the prescribed method for determining averages (estimating the average by visual observation) rather than a calculation was adequate.

3) A training brief was issued to promulgate an acceptable method for averaging meteorological data.

4) a) The formal method for averaging meteorological tower data is being incorporated into emergency procedure (EP) 20126.

   b) A plant change/modification (PC/M) is being instituted to change the meteorological tower data such that the data provided has already been mathematically averaged.

5) a) Full compliance for item 3 above was achieved by June 14, 1988.

   b) Full compliance for item 4 above will be achieved by October 1, 1988.

FINDING A.2:

Hardware changes made to the meteorological equipment at the meteorological tower resulted in range changes for the delta temperature (delta T) which were not reflected on the analog chart records in the Control Room. In addition, Control Room Operators were not aware that changes affecting the delta T had been made. This could have resulted in offsite dose calculation errors as large as a factor of 150 in the non-conservative direction.

RESPONSE:

1) FPL concurs with the finding.

2) The procedure for governing meteorological tower maintenance did not clearly delineate plant contact points for notifications.

3) An information tag was placed on the Control Room recorder to inform users of a method to derive corrected data as a result of the change to the meteorological tower instruments. The Environmental procedure governing meteorological tower maintenance and/or changes has been revised to clearly delineate responsibilities for tower maintenance and changes. The procedure also requires additions, deletions, and changes to the meteorological tower to be processed in accordance with plant procedures.

4) A Design Equivalent Engineering Package (DEEP) 88-129 is being processed to change the meteorological tower chart recorder in the control room to reflect the changes that were made at the tower.

5) a) Full compliance for item 3 above was achieved by June 14, 1988.

   b) Full compliance for item 4 above will be achieved by October 1, 1988.

FINDING B:

10 CFR 50, Appendix B, Criterion V, as implemented by the licensee's accepted Quality Assurance Program (FPLQAR-1-76A, accepted June 10, 1987), Section 5.2.2, requires that activities affecting quality be in accordance with approved procedures.

The Quality Assurance Manual, Procedure QP 5.1, dated November 3, 1980, Section 5.4, Step 8, requires that procedures shall be developed to implement the Plant Emergency Plan.

Emergency Procedure 20126, dated October 25, 1985, Section 8.4, Step 8.4.1, describes the Offsite Dose Calculation using the computer program.

Contrary to the above, the licensee failed to establish and implement a computer software control procedure to ensure maintenance and control of the Class A Dose Assessment Computer Model.

RESPONSE:

1) FPL concurs with the finding.

2) A policy letter had been written by the supervisor responsible for the computer program to provide administrative control for any software changes. Cognizant personnel believed that a policy letter was sufficient for administrative controls.

3) a) A policy was established to prohibit changes to the software until a procedure controlling that software was implemented.

b) A Nuclear Energy Services Procedure (JNS) JNS-HP 5.0, Software Control Procedure FPL Class A, Emergency Off-site Dose Calculation Program, has been instituted to control software changes.

4) A vendor, HMM Associates, has been contracted to perform a software review of the Off-site Dose Calculation Computer Program and generate a source code description document.

5) a) Full compliance for item 3 above was achieved by May 16, 1988.

b) Full compliance for item 4 above will be achieved by June 30, 1989.