

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

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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    AUTHOR 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 50-250/88-14 & 50-251/88-14.

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FPL

AUGUST 29, 1988

L-88-364

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 88-14

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

SDF.IR

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PDR ADCK 05000250  
Q PDC

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## ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4  
DOCKET NOS. 50-250 AND 50-251  
IE INSPECTION REPORT 250-88-14 AND 251-88-14

### FINDING

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 11, Topical Quality Requirement (TQR) 3.0, Revision 5, requires that 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) 45.2.11-1974, 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 documented procedures shall be provided for design changes to approved design documents which assure that the impact of the change is carefully considered, required actions documented and information concerning the change is transmitted to all affected persons and organizations. These changes must be justified and subjected to control measures commensurate with those applied to the original design.

Original design specification 5610-M-50 and current design specification 5177-PS-11 both specify that fittings for the Intake Cooling Water (ICW) system be made from stainless steel.

Contrary to the above, on March 5, 1986, a change was made to the ICW design specifications through the resolution of non-conformance report 86-112, attachment D, drawing 5610-J-155-P10, Note 12, which allowed the use of a carbon steel fitting between the root valve and the main header for pressure gauge PI-3-1452. The increased susceptibility of the carbon steel to corrosion was not carefully considered or justified through an engineering evaluation. Subsequently, on April 27, 1988, the fitting failed due to salt water induced corrosive wear. This resulted in the 3A ICW pump being place(d) out of service.

### RESPONSE

- 1) Florida Power and Light accepts the Violation as stated with the exception of the following; Drawing 5610-J-155-P10, Revision 0 allowed carbon steel material for the piping on PI-3-1452 only. This instrument is installed on the 3C pump while the failure on April 27, 1988 occurred on the 3A pump. The carbon steel material installed on the 3A pump was not approved by non-conformance report (NCR) 88-112.
- 2) A contracted engineering firm provided an NCR dispositon which included a drawing that inadvertantly authorized a design change for an as found condition without providing appropriate design evaluation. The purpose of NCR-86-112 was



to identify and provide corrective action for the pressure gages which were not in conformance with design documents. The text of the NCR disposition only addressed the acceptability of pressure gages, and upon review of the disposition by Power Plant Engineering the fact that the drawing authorized a change in piping material was not noticed. Drawing 5610-J-155-P10 Revision 0 was included in the disposition of the NCR to assure that replacement gages were installed in accordance with the seismic analysis. Although this drawing appears to allow a change in piping material, the intent of the drawing was to document the field condition for the purpose of providing instruction to the installer of replacement gages.

- 3) The fitting which failed on the 3A pump was replaced with stainless steel material which meets the requirements of class L of the piping specification. Florida Power and Light has verified that no carbon steel material is presently installed on the remaining ICW pump discharge gauge piping.
- 4) New procedures for NCR dispositions are being implemented for FPL and its contractors. These procedures require the identification of design changes in NCR dispositions and require these design changes to be documented through the normal design change, PC/M process. The modified procedures are as follows:

Florida Power and Light - JPE-QI-15.1  
Bechtel Power Corporation - EDPI-4.61-10

- 5) a) The carbon steel fitting described in item 3 above was replaced by May 31, 1988.
- b) Compliance for item 4 above is as follows:

JPE-QI-15.1 dated May 13, 1988 is currently in use.  
EDPI-4.61-10 is expected to be implemented by September 30, 1988.