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SUBJECT: Forwards revised response to violations noted in Insp Rept 50-251/88-05.

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SEPTEMBER 2 2 1988

L-88-402

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Unit 4
Docket No. 50-251
Inspection Report 85-05 - Revised Response

A revised response to the subject inspection report is attached. This revised response is being submitted in accordance with a request by Mr. W. P. Kleinsorge, NRC Region II on August 12, 1988. Florida Power & Light Company (FPL) previously provided responses to the referenced notice of violation in our letters L-85-192, dated April 5, 1985 and L-86-183, dated May 2, 1986.

Very truly yours,

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

IE01
1/1

ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket No. 50-250, 50-251
IE Inspection Report 250-85-05 and 251-85-05

FINDING 1:

10 CFR 50.55a(g) requires that inservice testing, to verify operational readiness, of pumps and valves whose function is required for safety, be accomplished in accordance with Section XI of the ASME Boiler and Pressure Vessel (B and PV) Code. ASME B and PV Code, Section XI, 1980 edition through Winter 1980 addenda, has been identified as the applicable code for inservice testing. ASME B and PV Code, Section XI, Paragraph IWV-3415, requires fail-safe valves be tested by observing the operation of the valves upon loss of actuator power. The Main Steam Isolation Valves have been identified as fail-safe valves.

Contrary to the above, inservice testing of pumps and valves and inservice inspection of components were not accomplished in accordance with ASME B and PV Code, Section XI, in that the Main Steam Isolation Valves were fail-safe tested with the instrument air actively connected to the valve actuators.

RESPONSE:

1) FPL concurs with the finding.

2) The reason for the finding was that the MSIV's were misclassified as fail safe valves in the Inservice Test Program. The MSIV's do not fail closed in all conditions, as identified in LER 250-85-020. In addition, an air reservoir cylinder existed in the air line to the main steam isolation valve (MSIV) actuator and it was assumed that air would always be available to the valve whether or not the instrument air supply was isolated.

3) a) The MSIV's are no longer identified as fail safe valves for the Inservice Testing program.

b) The Unit 3 MSIV's have been modified to utilize a safety related backup nitrogen supply system. This system ensures MSIV closure in five seconds or less without instrument air and without steam flow. This modification removed the requirement that the MSIV's be fail safe valves since a safety related source of actuator power was provided.

c) Procedure 3-OSP-072, "Main Steam Isolation Valve Closure Test," has been revised to require that instrument air is isolated and the instrument air reserve tanks have been vented prior to MSIV testing.

d) An interim nitrogen supply system has been installed for Unit 4. This manually operated nitrogen supply supplements the existing instrument air system to ensure the MSIV's can be maintained closed when required.

4) a) The Unit 4 MSIV's will be modified to utilize a dedicated safety related air accumulator for each MSIV. This modification meets the same design basis as the nitrogen supply system installed for the Unit 3 MSIV's and referenced in 3a above. Originally, the Unit 4 modifications were to be similar to the Unit 3 modifications, however, the nitrogen system has proven to require considerable Operations and Maintenance attention. Because of this, the design for the Unit 4 modifications was changed to utilize the simpler air accumulators.

b) Procedure 4-OSP-072, "Main Steam Isolation Valve Closure Test," will be revised to require that the instrument air system be isolated prior to testing.

5) a) Full compliance for item 3a, 3b, 3c and 3d above was achieved by October 8, 1987.

b) The modification to the Unit 4 MSIV's is scheduled to be completed by the end of the 1988 Unit 4 refueling outage. However, because of the scope change as described in item 4a above, this modification may not be completed as scheduled due to equipment delivery schedules. Every attempt will be made to complete this modification during this outage.

c) Full compliance for item 4b above will be achieved 30 days following the completion of the modification referenced in item 4a.