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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 NRC ltr re violations noted in Insp Repts
 50-250/88-25 & 50-251/88-25.Corrective actions:

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 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

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OCTOBER 26 1988

L-88-466

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 88-25

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

Very truly yours,

W. F. Conway
Senior Vice President - Nuclear

WFC/SDF/gp

Attachment

cc: Malcolm L. Ernst, Acting Regional Administrator,
Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

8811010437 881026
PDR ADDCK 05000250
Q PNU

an FPL Group company



ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250 AND 50-251
IE INSPECTION REPORT 250-88-25 & 251-88-25

FINDING

10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants, Criterion V, as implemented by the approved Florida Power and Light Company Topical Quality Assurance Report (FPLTQAR) 1.76A, Revision 10, (June 24, 1988), and in Topical Quality Requirement (TQR) 5.0, Revision 7, (June 24, 1988), requires that activities affecting quality assurance shall be prescribed by documented instructions, and shall be accomplished in accordance with these instructions, procedures or drawings.

Contrary to the above, Maintenance Procedure (MP) 3507.2, entitled "Spent Fuel Pit Pump - Disassembly, Repair and Assembly (Ingersoll-Rand)", revision dated November 4, 1986, did not provide adequate instructions or drawings for the assembly and installation of the 4A SFP cooling pump, as evidenced by the improper mounting of the constant level oiler. The improper mounting of the oiler resulted in inadequate lubrication of the pump bearings and the subsequent failure of the pump.

RESPONSE:

- 1) Florida Power and Light accepts the violation.
- 2) The reason for the violation was the omission of specific instructions related to the proper mounting of the constant level oiler from Maintenance Procedure (MP) 3507.2.
- 3) The following actions have been or will be taken to address the violation:
 - a. Procedure 3507.2 was revised on September 9, 1988 to incorporate specific instructions related to the proper mounting of the constant level oilers by an On-The-Spot-Change to the procedure. An On-The-Spot-Change was also implemented for the other Spent Fuel Pool Cooling pump which utilizes a constant level oiler. This was completed on October 21, 1988.
 - b. Maintenance Mechanics have been trained in the identification of oiler types, how to set the required oil level, and how to replenish the oiler supply bottle. This was completed on September 27, 1988.
 - c. Oil filled safety related pumps, accessible during power operations, were inspected to verify the type of oiler installed, the configuration of the oiler to the bearing housing, actual oil level in bearing frame, oil leakage and oil level mark on the bearing housing. This inspection was completed on September 3, 1988. Some discrepant conditions were

identified which do not affect pump operability. Correction of these discrepancies is ongoing and will be completed by December 14, 1988. The remaining oil filled safety related pumps will be inspected during the current unit 4 refueling outage and the current unit 3 outage.

- d. Responsibility for replenishment of oilers was specifically assigned to the mechanical maintenance department on September 27, 1988. This will provide assurance of consistent proper oil level maintenance.

4) The corrective actions which have been or will be taken to avoid recurrence include:

- a. All three fuel pool cooling pump maintenance procedures will be permanently revised to provide adequate instructions and drawings for oiler installation and maintenance where applicable. Other safety related pump procedures will be reviewed to assure the adequacy of the instructions and drawings for oiler installation and maintenance. Necessary revisions will be completed by December 31, 1988.
- b. Preventative Maintenance work instructions for pumps with constant level oilers will include data sheets which specifically address oiler maintenance. This was incorporated on September 7, 1988.
- c. Initial and continuing training for maintenance mechanics will include a description of this event.

5) Permanent maintenance procedure revisions will be completed by December 31, 1988.

The deficiencies identified during the inspection of all safety related pumps will be corrected by December 14, 1988.

The training program for maintenance mechanics will incorporate the lessons learned in this event into the 1989 lesson plans.

The remaining oil filled safety related pumps will be inspected during the current unit 4 refueling outage and the current unit 3 maintenance outage.

