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ACCESSION NBR: 8812070138 DOC. DATE: 88/11/30 NOTARIZED: NO DOCKET #
 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 CONWAY, W.F.
 AUTH. AFFILIATION Florida Power & Light Co.
 RECIP. NAME
 RECIP. AFFILIATION

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SUBJECT: Provides addl info re drawing update program at plant, per 881114 mgt meeting.

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P.O. Box 14000, Juno Beach, FL 33408-0420

NOVEMBER 30 1988

L-88-518

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
Drawing Upgrade Program

At the FPL-NRC Management Meeting held at Turkey Point on November 14, 1988, the program for updating Turkey Point Plant drawings was discussed. In several conversations with NRC Region II Staff members since that meeting, questions regarding the status of this program were raised. The purpose of this letter is to provide additional information on the drawing update program.

Selected plant systems were walked down against selected plant drawings under the original Performance Enhancement Project and the Select Systems Program. The selected drawings used in these walkdowns included:

- (1) Training and Education Drawings (T&Es) in existence in 1985
- (2) Piping & Instrument Diagrams (P&IDs) for selected safety related and important to safety systems
- (3) Breaker list for systems except a few nonvital (lighting-type) panels

In addition, small bore piping and tubing on selected safety related and important to safety systems were walked down to verify functionality and to develop isometrics.

The walkdowns were extensive in scope and procedurally guided to identify differences between the reference document (drawing) and the field, as well as, to identify physical (maintenance-type) deficiencies with equipment. These various walkdowns resulted in numerous discrepancies. In accordance with our corrective action procedures, discrepancies were reviewed for their effect on the operability of safety components. Those items which were determined to not have an operability problem were designated for resolution under the drawing update program. This program, as has been previously discussed, is a long term project with a scheduled completion date in 1991. An independent sampling of the walkdown results by the Safety Engineering Group assists in substantiating the walkdown programs.

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The process used in the past to disposition discrepancies failed to identify these discrepancies to operations while the drawings were being updated. There have been several recent examples of this problem such as instrument air isolation, vent and drain valve impact on refueling integrity, and CCW surge tank indication. An effort to address this concern has been initiated. This will involve re-review of existing discrepancies and may result in additional operability concerns. To accomplish this review, operations department personnel established a prioritized list of key operating and maintenance drawings. This prioritized list includes:

- (1) Sensitive Safety Systems, Logics and Safety Related portions of Breaker List
- (2) Other Safety Systems and Logics
- (3) Sensitive Non-Safety Systems and Logics
- (4) Other Non-Safety Systems and Logics


Plant and engineering personnel will implement an interim drawing update methodology and will establish the necessary control procedures. Engineering will evaluate the discrepancies against the prioritized operation and maintenance drawings and ensure appropriate operability evaluations are complete, and if appropriate, develop 10 CFR 50.59 evaluations. These 50.59 evaluations will be developed if any of the discrepancies represent deviations from the FSAR.

We are satisfied that the activities described above will provide a high degree of assurance to station operators that the drawings they use accurately reflect the as built condition of the power plant.

Additionally, Turkey Point has elected to randomly sample selected electrical connection diagrams and to evaluate and correct any identified discrepancies, as appropriate.

Should there be any questions on this program, please contact us.

Very truly yours,


W. F. Conway
Senior Vice President - Nuclear

WFC/PLP/gp

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

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THE
FOLLOWING
TABLE
GIVES
A SUMMARY
OF THE
RESULTS
OBTAINED
IN THE
EXPERIMENTS
CONCERNING
THE
EFFECT
OF THE
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