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SUBJECT: Clarifies 881202 discussions re drawing update activities.

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DECEMBER 9 1988

L-88-521

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

Gentlemen:

Re: Turkey Point Unit Nos. 3 and 4
Docket Nos. 50-250 and 50-251
Drawing Update Program

The purpose of this letter is to clarify discussions held between Florida Power & Light Company (FPL) personnel and members of your staff and NRC Headquarters staff on December 2, 1988 regarding drawing update activities. Also, this letter provides additional details on the activities that FPL has undertaken to assure the accuracy of selected drawings that will be used in the control room by the operations personnel for the restart and subsequent operation of Turkey Point Unit 3. This letter supplements FPL letter L-88-518, dated November 30, 1988.

As indicated in our November 30, 1988 letter, many plant systems have been walked down as part of several earlier improvement programs at Turkey Point. These walkdowns were extensive and resulted in numerous discrepancies being identified. Discrepancies were programmatically identified on non-conformance reports (NCR's) which allowed engineering to formally assess the safety significance of the finding. The flow chart defining this process was included with NRC enforcement action EA 86-20 dated August 12, 1986 and is attached for reference.

The above process required that NCR's be reviewed for operability, and where deemed appropriate, safety and reportability evaluations against 10 CFR 50.59, 10 CFR 21, and 10 CFR 50.72 were performed. NRC documented their review of this process in Inspection Report 87-32, in which a previous inspection follow-up item regarding the lack of adequate criteria for a safety evaluation determination was closed.

Currently FPL's Select System walkdowns are essentially complete with portions of only three systems remaining, and FPL is proceeding with the drawing update process in accordance with the Integrated Schedule.

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In addition to the discrepancies documented by NCR's, there have been additional discrepancies documented as Requests for Engineering Assistance (REA). As of November 9, 1988, there were approximately 750 open NCRs and 260 open REAs, a total of about 1,010.

After an initial review of the open NCRs, it was determined that about 280 of the NCRs described discrepancies against plant drawings. Most of the remaining NCRs identified conditions in the plant requiring plant work orders (PWO) for repair. These approximately 280 NCRs and 260 REAs were then reviewed to categorize the types of discrepancies documented and to identify the drawings affected by each discrepancy.

Engineering personnel, together with plant operations personnel, reviewed the discrepancies to discount those that were not actual drawing discrepancies. Examples of those not considered drawing discrepancies are as follows:

- Completed (Discrepancy resolved)
- Items not tagged in field (Drawing correct)
- Requests to update vendor manuals
- Requests to enhance item description
- Items that are covered on PWOs
- Items not accessible for walkdown (NCR written to document that fact on original walkdown)
- Request for additional information on drawing
- Data shown is incomplete (e.g. breaker settings)
- Requests for plant change
- No discrepancy on current revision of drawing

As a result of the above review, approximately 85 of the NCRs and 210 of the REAs document actual drawing discrepancies. In order to identify those drawing discrepancies requiring resolution prior to Turkey Point Unit 3 restart, a further screening was performed. The criteria for this screening was based on drawings essential for Unit 3 operation. Approximately 32 NCRs and 80 REAs were identified as a result of this screening. About 75 percent of these 32 NCRs were the result of the Select System walkdown program, and the remainder were the result of FPL's nonconformance program. The process used for performing operability reviews on Select System NCRs is procedurally the same as that applied under FPL's nonconformance program. That process evaluates identified conditions for potential impact on operability. Additionally, the non-conformance program evaluates the need to perform a 10 CFR 50.59 evaluation.



The REAs (approximately 260) identified as outstanding that dealt with drawing discrepancies underwent a review for impact on operability. As a result of this review, approximately 30 discrepancies were identified as requiring additional review. Approximately ten of these items have received a documented operability assessment consistent with the format and guidance of FPL's nonconformance program. No operability concerns were identified. The remaining REAs will be reviewed for operability concerns, and any concerns identified will be resolved prior to Turkey Point Unit 3 entering Mode 2. In the future, to ensure timely operability assessments and resolution, non-conformances will not be processed as REAs.

Concurrent with the above activities, the Turkey Point Operations Department identified the drawings that they consider essential for operation of the plant. These selected plant operating drawings, which are maintained in the control room, were categorized as follows:

1. Sensitive Safety Systems and Logics
2. Other Safety Systems and Logics
3. Sensitive Non-Safety Systems and Logics
4. Other Non-Safety Systems and Logics (prior to Turkey Point Unit 3 Mode 2 operation)
5. Other Non-Safety Systems and Logics, and Turkey Point Unit 4 only drawings (after Turkey Point Unit 3 Mode 2 operation)

The drawings in categories 1 through 4 were selected to be updated first as red-line drawings, incorporating the applicable discrepancies. A total of 129 drawings were identified in these categories.

The engineering department then identified the discrepancies affecting the drawings in categories 1 through 4. These discrepancies have been red-lined onto the latest drawing revisions. Upon completion of any required operability or safety evaluations, these drawings will be issued to the plant for use. The Quality Assurance Department will select a sample of red-lined drawings to verify, by walkdown, the accuracy of drawing changes made as a result of this process.



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A new interim drawing program is being established to address drawing discrepancies found by site personnel. This program will control the preparation of red-line drawings, the review by appropriate plant and engineering personnel, the distribution to Control Room, Simulator Facility and Technical Support Center and the subsequent engineering to update plant drawings and eliminate red-line markings of the discrepancies. Red-line drawings that are initiated by NCRs will be normally incorporated into permanent drawing revisions within about sixty days. In addition, NCR's associated with drawing discrepancies generated since November 9, 1988, will be handled in accordance with the above process.

The following will be completed prior to Turkey Point Unit 3 entering Mode 2:

- Operability screening for REAs.
- The red-line effort for Unit 3 and Common Plant priority drawings.
- Engineering and plant procedures regarding control of red-line drawings.
- QA Department walkdown of a sample of red-line drawings.
- Plant review/approval of operating procedures to address changes as a result of the red-line process, including training as appropriate.

Additionally, the following will be completed prior to Turkey Point Unit 4 entering Mode 2:

- Design Equivalent Engineering Packages (DEEP), Engineering Packages (EP), or red-lining will be utilized to resolve identified discrepancies for Unit 4 priority drawings.

The long term Drawing Update Program addresses backlog reduction and improvements in the on-going updating process. Updating will begin in this program in January 1989. All safety related control room drawings will be updated by the end of 1989. All other safety related drawings will be updated by June 1990. As drawings are updated, they will be entered into the plant document control system. This program will place resources and priority on the important safety related operations drawings.

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The efforts described above reinforces our confidence in the select system and current nonconformance programs. Interim red line drawings in the control room provide required operator information for safe operation. Based on the above FPL is confident that safe operation of the Turkey Point units will be maintained.

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

Very truly yours,



W. F. Conway
Senior Vice President - Nuclear

WFC/RJS/pw
Attachment

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

ISSUES (AS FOUND CONDITION) RESOLUTION PROCESS

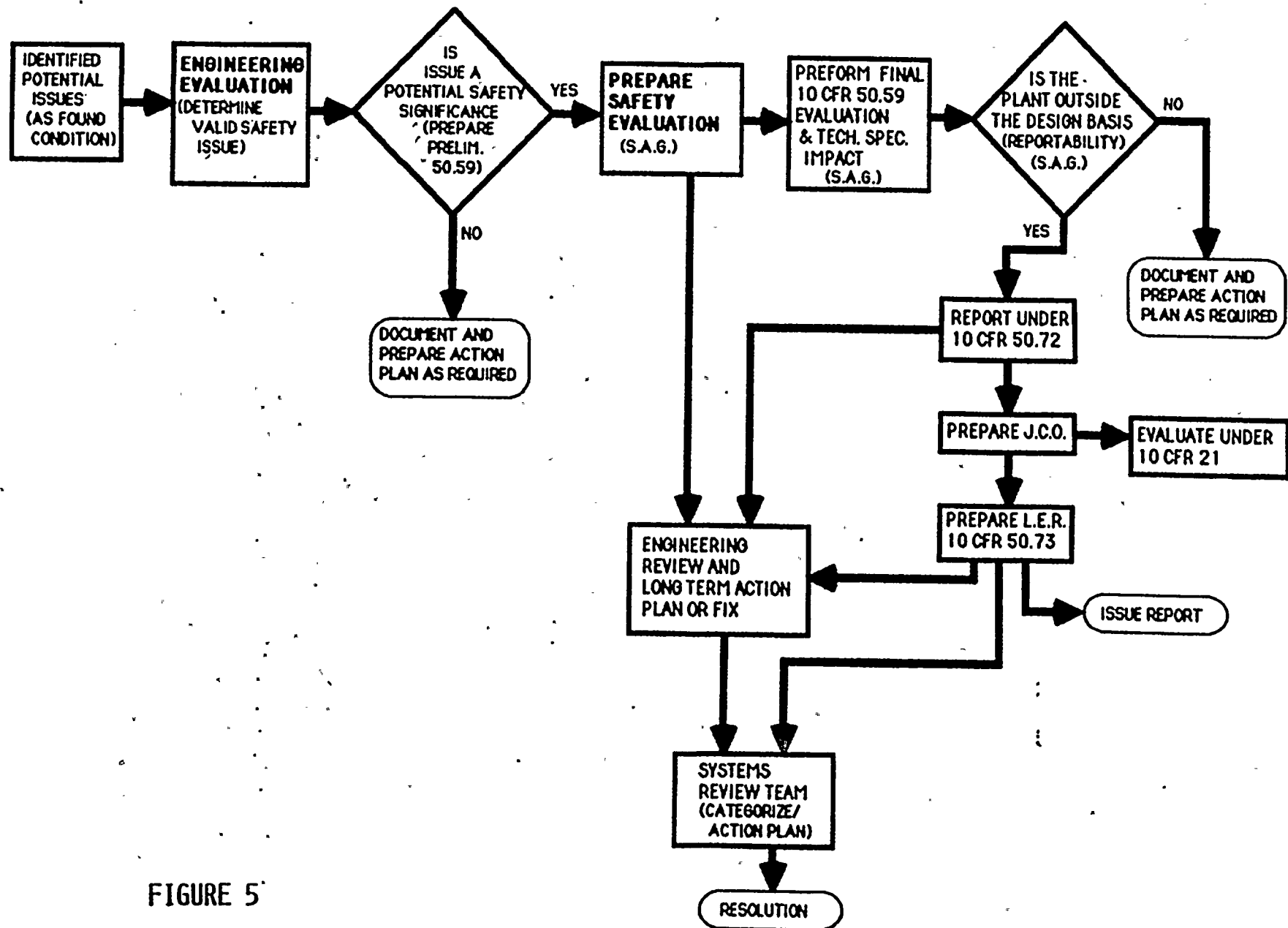


FIGURE 5



Age Group	Total (%)	Male (%)	Female (%)
0-4	~5	~5	~5
5-14	~10	~10	~10
15-24	~65	~60	~70
25-34	~55	~50	~60
35-44	~45	~40	~50
45-54	~35	~30	~40
55-64	~25	~20	~30
65+	~15	~10	~20

