

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SESSION NBR: 8904280167 DOC. DATE: 89/04/21 NOTARIZED: NO DOCKET #
 ACIL: 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
 50-250/89-06 & 50-251/89-06.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-2 PD	1 1	EDISON, G	1 1
INTERNAL:	AEOD	1 1	AEOD/DEIIB	1 1
	DEDRO	1 1	NRR SHANKMAN, S	1 1
	NRR/DEST DIR	1 1	NRR/DLPQ/PEB 11	1 1
	NRR/DLPQ/QAB 10	1 1	NRR/DOEA DIR 11	1 1
	NRR/DREP/EPB 10	1 1	NRR/DREP/RPB 10	2 2
	NRR/DRIS DIR 9A	1 1	NRR/PMAS/ILRB12	1 1
	NUDOCS-ABSTRACT	1 1	OE LIEBERMAN, J	1 1
	OGC/HDS2	1 1	<u>REG FILE</u> 02	1 1
	RGN2 FILE 01	1 1		
EXTERNAL:	LPDR	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 23. ENCL 23

R
I
D
S
/
A
D
D
S

R
I
D
S
/
A
D
D
S





FPL

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

APRIL 21 1989

L-89-153
10 CFR 2.201


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 89-06

Florida Power & Light Company has reviewed the subject inspection report and pursuant to 10 CFR 2.201 the response is attached.

Very truly yours,


W. F. Conway
Senior Vice President - Nuclear

WFC/JRH/gp

Enclosure

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

8904280167 890421
PDR ADOCK 05000250
Q PDC

an FPL Group company





ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Reply to Notice of Violation
Inspection Report 89-06

FINDING:

TS 6.8.1 requires that written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Appendix A of USNRC Regulatory Guide 1.33 and Sections 5.1 and 5.3 of ANSI N18.7-1972.

1. Contrary to the above, OP-14004.1, Steam Generator Protection Channels-Periodic Test, revision dated September 20, 1988, was inadequate in that it contained an editorial error, referencing the wrong procedural steps in a Caution, which caused a reactor trip on February 10, 1989.
2. Administrative Procedure 0103.4, In-Plant Equipment Clearance Orders, revision dated January 5, 1989, specifies the required instructions to obtain, issue and release clearances to ensure safety and protection of plant personnel and equipment.

Contrary to the above, on February 18, 1989, the clearance used to test valve 4-843A was inadequate in that valve 4-836 was not included to be kept in the closed position. This resulted in the uncontrolled transfer of approximately 1000 gallons of borated water from the Unit 3 RWST to the Unit 4 RCS.

3. Operating procedure 4-OP-201, Filling/Draining the Refueling Cavity and Spent Fuel Pool (SFP) Transfer Canal, revision dated January 26, 1989, Section 7.4, provides instructions for pumping the SFP Transfer Canal to the SFP. Steps 7.4.2.7 thru 7.4.2.13, provide instructions for terminating the evolution.

Contrary to the above, on February 19, 1989, the operators failed to perform these steps in the proper sequence resulting in the inadvertent draining of SFP water to the SFP transfer canal.



RESPONSE:

1. FIRST EXAMPLE

- a. FPL concurs with the finding.
- b. This example was due to procedural inadequacy in that the caution regarding the potential for reactor trip did not list all of the applicable step numbers. An additional factor was that two applicable procedures, OP 14004.1 and 3-SMI-071.4 were in effect at the same time. Procedure OP 14004.1 was to be replaced by 3-SMI-071.4 and six other procedures. Although the new procedures had been approved and issued, they were not in use because a first use test had not been performed. Had these procedures been in use, the reactor trip probably would not have occurred.
- c. Procedure OP 14004.1 was revised to correct the applicable step numbers, and the procedure was completed to satisfy the surveillance requirement. The procedures that replace OP 14004.1 had first use tests performed and procedure OP 14004.1 has been cancelled.
- d. Work controls will be developed to ensure old procedures are cancelled in a timely manner after new upgrade procedures are approved.
- e. The action described in item d. above will be completed by June 1, 1989.

2. SECOND EXAMPLE

- a. FPL concurs with the finding.
- b. This example was due to inadequate information entered on the clearance request. The clearance request did not identify that valve 4-843A would be stroked, but only requested that the breaker for valve 4-843A be racked out.
- c. Valve 4-836 was closed to stabilize reactor vessel level.
- d. FPL is currently analyzing the clearance order process. Following completion of this analysis, the procedure governing clearance orders will be revised as necessary to correct any deficiencies identified.
- e. The action described in item d. above will be completed by June 1, 1989.



3. THIRD EXAMPLE

- a. FPL concurs with the finding.
- b. This example was due to inadequate communications between two operators. The directive given by the operator controlling the evolution was not understood by the operator performing the valve manipulations, and the valves were manipulated out of sequence.
- c. The operators responsible for the communication error were counseled on the importance of clear communications. The Operations Supervisor issued a letter emphasizing the communications policy concerning repeat backs. The importance of clear communications is addressed during operator training and during simulator requalification. The initial training lesson is derived from INPO Good Practice 85-107. Additionally, the importance of clear concise communications was re-emphasized during the recent simulator requalification exercises.
- d. No additional corrective actions are required.
- e. Full compliance has been achieved.

