

## ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS).

ACCESSION NBR:8905250472 DOC.DATE: 89/05/11 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 AUTHOR AFFILIATION  
 OODY,C.O. Florida Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 Region 2, Ofc of the Director

SUBJECT: Responds to violations noted in Insp Repts 50-250/89-07 &  
 50-251/89-07. Corrective actions noted.

DISTRIBUTION CODE: IE01D COPIES RECEIVED:LTTR 1 ENCL 1 SIZE: 5  
 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
AEOD/TPAD	1 1	DEDRO	1 1
NRR SHANKMAN,S	1 1	NRR/DEST DIR	1 1
NRR/DLPQ/PQEB	1 1	NRR/DOEA DIR 11	1 1
NRR/DREP/EPB 10	1 1	NRR/DREP/RPB 10	2 2
NRR/PMAS/ILRB12	1 1	NUDOCS-ABSTRACT	1 1
OE LIEBERMAN,J	1 1	OGC/HDS2	1 1
REG FILE 02	1 1	RGN2 FILE 01	1 1
INTERNAL: 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 22 ENCL 22





MAY 11 1989

L-89-175  
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 89-07

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

Very truly yours,

*J. K. Woody*  
for C. O. Woody

Acting Senior Vice President - Nuclear

COW/JRH/gp

Attachment

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

8905250472 890511  
PDR ADOCK 05000250  
Q PNU

IEO1  
11



## ATTACHMENT 1

### RESPONSE TO NOTICE OF VIOLATION NRC INSPECTION REPORTS NOS. 50-250, 251/89-07

#### Finding

10 CFR 50, Appendix B, Criteria V and the licensee's accepted Quality Assurance (QA) Program collectively require that activities affecting quality be prescribed by procedures and accomplished in accordance with those procedures. Procedures 3CMM-041.1, Pressurizer Safety Valve Repair and Setting, and 3SMM-041.1, Pressurizer Safety Valve Setpoint Testing, contain requirements for setting the ring settings for pressurizer safety valves.

Contrary to the above, activities affecting quality were not accomplished in accordance with procedures, in that, the pressurizer safety valve's as left ring settings were not adjusted to the as found ring settings following setpoint testing and maintenance during the Unit 3 1987 refueling outage.

#### FPL Response

- 1) FPL concurs with the finding.
- 2) After the Unit 3 pressurizer safety valves 551A, 551B, and 551C were setpoint tested during the Unit 3 1987 outage, the maintenance personnel involved set the nozzle rings per the recommendations of the on-site vendor technical representative, and recorded these ring settings on the completed procedure of record. These actions contradicted procedure 3-SMM-041.1, which required the nozzle ring settings to be returned to the as-found setting.
- 3) An engineering evaluation has been conducted to evaluate the acceptability of the ring settings for the pressurizer safety valves. It concluded the ring settings were acceptable.
- 4) Maintenance personnel are instructed in Maintenance Instruction, MI-700, "Conduct of Maintenance." MI-700 provides the programmatic structure for the performance of maintenance, and delineates the activities for which the maintenance department are accountable. Attachment 3 of the procedure provides the fundamental guidelines for maintenance procedure use. It instructs maintenance personnel to perform the procedure as written. If a section is incorrect or requires action beyond that allowed in the procedure, work is to be stopped and the personnel's supervisor is to be contacted. As stated in MI-700, the maintenance department line management's responsibility is to correct deficiencies in procedures on the spot when observed.



- 5) The action identified by item 3 above was completed on March 1, 1989.

The Maintenance Instruction, MI-700, identified by item 4, was issued on November 7, 1988. Maintenance personnel were trained in MI-700 on November 10 through December 2, 1988, and MI-700 was part of the Technical Staff continuing training program dated 03/03/89.

#### Finding

10 CFR 50, Appendix B, Criteria VI and the licensee's accepted QA Program collectively require that measures be established to control the issuance of procedures, including changes which prescribe all activities affecting quality.

Contrary to the above, measures were not established to control changes to procedures, in that, pressurizer safety valve 551B was replaced during the Unit 4 1988 outage and governing procedures were not updated to reflect the new ring settings.

Contrary to the above, Florida Power and Light Inter-Office memorandum dated August 12, 1986, recommended changing similar procedures to reflect accurate pressurizer safety valve ring settings. This action was not accomplished prior to the Unit 3 refueling outage in 1987; consequently, the pressurizer safety valve ring settings were not set in accordance with the vendor as-shipped data.

#### FPL Response

- 1) FPL concurs with the finding.
- 2a) The first example cited above was due to a procedural deficiency in 4-CMM-041.1 and 4-SMM-041.1. Following replacement of pressurizer safety valve 551B during the Unit 4 1988 outage, the plant personnel involved adjusted the ring settings in accordance with 4-SMM-041.1. This procedure did not provide instructions in case of a valve being replaced. Thus, the ring settings for pressurizer safety valve 551B were not set at the vendor's as-shipped ring settings.
- 2b) The second example cited above was due to failure to transmit the information, dated August 12, 1986, to the Procedure Update Group. Upon receipt of the information, the affected procedures (3/4-CMM-041.1 and 3/4-SMM-041.1) were not revised prior to the April 1987 Refueling Outage as required.
- 3a) An engineering evaluation of the pressurizer safety valves' ring settings has been performed and concludes that the current ring settings are acceptable.
- 3b) Following receipt of the Interoffice Memorandum dated August 12, 1986, the Procedure Upgrade Group incorporated the as-shipped nozzle and guide ring settings into procedures 3/4-SMM-041.1 and 3/4-CMM-041.1.
- 4a) Procedures 3/4-CMM-041.1 and 3/4-SMM-041.1 will be revised to state





the proper as-shipped nozzle and guide ring settings for pressurizer safety valve 551B, and delineate the action to take if a pressurizer safety valve is replaced.

- 4b) The Technical Department has established an action item tracking system to ensure actions required by the Technical Department are tracked and completed.
- 5a) The corrective action in item 3a above was completed on 05/01/89.  
The corrective action in item 4a above will be completed by 06/30/89.
- 5b) The corrective action in item 3b above was completed by 11/03/87.  
The corrective action in item 4b above was initiated in February 1989.

#### Finding

10 CFR 50.55a.(g).(4).(ii) states that inservice examinations of components and inservice tests to verify operational readiness of pumps and valves whose function is required for safety shall comply with the requirements of the Code (ASME, Section XI).

ASME Boiler and Pressure Vessel Code - 1980, Section XI, Paragraph IWV-3417(a), requires that if a stroke time increase of 50 percent or more for valves with full-stroke times less than or equal to 10 seconds is observed, test frequency shall be increased to once each month until corrective action is taken, at which time the original test frequency shall be resumed. In any case, any abnormality or erratic action shall be reported.

Contrary to the above, the stroke time for valve CV-3-4658A, tested on August 7, 1988, and valve CV-4-2907, tested January 7, 1988, increased by more than the Section XI limits of 50 percent and the test frequency was not increased nor was adequate corrective action taken.

#### FPL Response

- 1) FPL concurs with the finding.
- 2) The reason for the violation was a procedural deficiency. OP 0209.1, "Valve Exercising Procedure," allowed the retesting of a valve that failed to meet the acceptance criteria. This led to violation of the ASME, 1980, Section XI, Paragraph IWV-3417(a) requirement.



- 3) An On The Spot Change to procedure OP 0209.1, "Valve Exercising Procedure," has been issued deleting the statement which permits retesting of a valve that has failed to meet the required stroke time acceptance criteria. Thus, only the initial test is used as a basis to determine the surveillance frequency. If a valve exceeds the acceptance criteria, the test frequency is increased to monthly, and the valve will remain on an increased test frequency until corrective action is taken.
- 4) See item 3 above for the corrective action.
- 5) The corrective action in item 3 above was completed on 04/28/89.

