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 FACIL:50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
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AUTH.NAME AUTHOR AFFILIATION
 WOODY,C.O. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Discusses integrated schedule Category A times, per 860812
 confirmatory order.

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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
Integrated Schedule Category A Items

Florida Power & Light Company's (FPL) Turkey Point Units 3 and 4 are the subject of a Confirmatory Order dated August 12, 1986. This order required FPL to complete the Select Systems review discussed in FPL letters L-86-112, dated March 19, 1986, and L-86-197 dated May 19, 1986. The remaining items to be performed under this review are included in the Turkey Point Integrated Schedule (I/S).

I/S Mod No. 576, "Air Start Motor Upgrade", and I/S Mod No. 1098, "Select System Walkdown NCRs on P&IDs", will not be completed by the dates indicated in the current I/S. I/S Mod No. 576 will be completed during the Unit 3 Diesel Tie-In/Unit 4 Cycle 13 refueling outages currently scheduled to begin the fall of 1990. I/S Mod 1098 will be completed by December 29, 1989. Since these modifications are Category A Items, NRC approval is required prior to revising their schedules. FPL had previously requested NRC approval to change the schedule for I/S Mod No. 576 (FPL letter L-89-91 dated March 9, 1989).

The scope for I/S Mod No. 1098 was defined in FPL letter L-86-112 dated March 19, 1986 (see Attachment 1). A listing of the nonconformance reports (NCRs) generated by the walkdowns by system and a status of their disposition are included in Attachments 2 and 3 respectively. FPL is working to complete disposition of the remaining NCRs and preparing changes to affected drawings, data bases, and other plant documents using the DEEP (Design Equivalent Engineering Package) process. Use of the DEEP process involves an increase in scope resulting in the need for additional time to complete the project. In addition, the implementation of the drawing redlining effort during the fall of 1988 and winter of 1989

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were deemed a higher priority on the engineering and drawing resources available to perform I/S Mod 1098. A schedule for issuing the DEEP packages to the site for approval is included in Attachment 4. Use of the DEEP process and the reverification walkdowns associated with the NCR resolutions will ensure that affected drawings and plant documents are identified as part of this program (not just P&ID's), and that the P&IDs associated with the 16 select systems will be reflective of the as-installed, as-designed field conditions. Delay in completion of this project to December 29, 1989 will have no safety or operational impacts. Each of the NCRs was reviewed for safety and operability concerns within three days of engineering receipt of the NCRs generated by the walkdowns. No safety or operability concerns were identified.

As previously stated in FPL letter L-89-91, I/S Mod No. 576, the addition of a second emergency diesel generator (EDG) air start motor, was one of several modifications FPL evaluated with the intent of improving EDG reliability in response to Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability" (FPL letter L-84-316 dated November 6, 1984) and also NUREG CR/0660, "Enhancement of On-Site Emergency Diesel Generator Reliability." This modification was identified as a Select System (I/S Category A) item in FPL letter L-86-527 dated December 23, 1986. FPL had requested an extension to the scheduled completion date to coincide with completion of the Emergency Power System (EPS) Enhancement Project. This extension would allow consideration of the lessons coming out of the EPS project such as installing larger air tanks and a different instrumentation scheme for increased reliability, and to permit consideration of plant comments regarding maintainability, operability and reliability. As stated above, the proposed modification is to enhance reliability and not resolve operability or safety concerns. The requirements for operability are clearly defined in the plant technical specifications, and surveillance testing is performed to ensure that the EDGs meet those requirements. Therefore, delay in completing this modification will not impact plant safety.

NRC approval is requested prior to the Unit 4 return to power currently scheduled for May 25, 1989.

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Should there be any questions regarding either modification, please contact us.

Very truly yours,



C. O. Woody
Acting Senior Vice President - Nuclear

COW/TCG/gp

Attachments

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

BASIS OF THE
ORIGINAL NRC
COMMITMENT
REGARDING P&ID
VERIFICATION NCR's

P. & I.D. VERIFICATION

PEOPLE: FPL CONSTRUCTION Q.C. INSPECTORS

PROCESS: * WALKDOWN EXISTING PIPING SYSTEMS DENOTING ANY DIFFERENCES FROM P. & I.D. DRAWINGS AND EXISTING FIELD CONDITIONS FOR SELECT SYSTEMS.

* PROCEDURES ISSUED

* VERIFICATION WILL REFLECT THE FOLLOWING ATTRIBUTES:

- VALVES, PUMPS & MECHANICAL EQUIPMENT AGREE WITH THE P. & I.D. FOR PROPER LOCATION, DESIGNATION AND POSITION.
- IN-LINE EQUIPMENT AGREE WITH P. & I.D.
- INSTRUMENTATION IS TAGGED AND LOCATED PROPERLY
- EVERYTHING IS INSTALLED IN SYSTEM THAT IS SHOWN ON P & I.D. AND CONVERSELY EVERYTHING IN THE SYSTEM IS SHOWN ON P. & I.D.

* MARKED UP P & I.D.'S ARE TRANSMITTED TO SITE DRAWING UPDATE FOR PROCESSING.

* DRAWING/AS-BUILT CONFLICTS WILL BE ADDRESSED ON "AS-BUILT VERIFICATION" REQUEST TO DRAWING UPDATE FOR REVIEW/ACTION.

* NON-CONFORMANCE CONDITIONS SUCH AS BROKEN/DAMAGED EQUIPMENT, CABLES, ETC. WILL BE DOCUMENTED FOR DISPOSITION

PRODUCT: * CORRECTION OF DISCREPANCIES

* AS-BUILT P&ID's

ATTACHMENT 2

NCR DISTRIBUTION BY SYSTEM

68 Verification NCR's Generated from the P&ID Walkdowns Address the Following 16 Systems (the number in paranthesis indicates the total number of NCR's written against that system - both units considered)

<u>Select Safety Systems</u>	<u>Other Safety Systems</u>	<u>Non-Safety-Related Systems</u>
Intake Cooling Water (2)	Chemical & Volume Control (6)	Turbine Plant Cooling Water (2)
Component Cooling Water (19)	Main Steam Isolation (3)	Instrument Air System (11)
Safety Injection System (7)		Breathing Air System (1)
Residual Heat Removal (5)		S/G Blowdown (1)
Auxiliary Feedwater (5)		Condensate Recovery (1)
		Primary M/U Water (1)
Containment Isolation (2)		SWLU and S/G WLU (1)
		Chemical Injection (1)

NCR DISPOSITIONING STATUS

Total NCR's required for Engineering corrective action:	68
Status of safety/operability reviews for all 68 NCR's:	100% complete
NCR's dispositioned by Engineering for corrective action (pre-DEEP era):	47 (69%)
NCR's dispositioned by Engineering for corrective action (post-DEEP era):	12 (18%)
Other NCR's dispositioned by Engineering (post-DEEP era without formal transmittal to Turkey Point site):	3 (4%)
Total number of NCR's with interim disposition by Engineering:	62 (91%)
Total number of NCR's yet to be dispositioned (all of those remaining NCR's are within the Instrument Air System):	6 (9%)

NOTE: The total number of non-conformance items can be estimated at approximately 25 items per NCR or roughly 1700 items (total).

ATTACHMENT 4

SCHEDULE FOR ISSUING DEEP PACKAGES FOR P&ID WALKDOWN NCR's

<u>DEEP Pkg. No./Select System</u>	<u>Total Number of NCR's Addressed in the DEEP</u>	<u>Status or Approximate JPN Issue Date to the Site for Approval</u>
1/MSIS	3	Issued week of 5/8/89
2/CVCS	6	5/19/89
3/RHR	5	5/22/89
4/TPCW	2	5/25/89
5/ICW	2	5/25/89
6/Chem Inj.	1	5/25/89
7/CCW	6	5/29/89
8/CCW	3	6/12/89
9/CCW	5	6/12/89
10/SIS	7	7/15/89
11/AFWS	5	7/31/89
12/CCW	5	7/31/89
13/Stm Gen	1	7/31/89
14/IAS	5	7/31/89
15/SGWLU	1	8/15/89
16/IAS	3	8/31/89
17/IAS	3	8/31/89
18/Miscellaneous	5	8/31/89

- NOTES
- (1) Final NCR dispositions to be developed following completion of all DEEP activities and issued for eventual closeout by Site QC by October 1, 1989
 - (2) Drawing Update activities resulting from the issuance of the above packages shall be completed by December 29, 1989.