

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9104020200 DOC.DATE: 91/03/29 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  
 GOLDBERG, J.H. Florida Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Repts 50-250/91-05 &  
 50-251/90-05. Corrective actions: Procedure 0-OSP-016.30  
 revised to incorporate addition of fire loop & responsible  
 fire protection member counseled.

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FPL

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

MARCH 29 1991

L-91-079  
10 CFR 2.201

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

Gentlemen:

Re: Turkey Point Unit 3 and Unit 4  
Docket Nos. 50-250 and 50-251  
Reply to Notice of Violation  
NRC Inspection Report 91-05

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

Very truly yours,

*J. H. Goldberg*  
J. H. Goldberg  
President  
Nuclear Division

TFP/MKA/ma

Attachment

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

9104020200 910329  
PDR ADOCK 05000250  
Q PDR

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IE01



## ATTACHMENT

### REPLY TO A NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4  
Docket Number 50-250 and 50-251  
NRC Inspection Report 91-05

#### FINDING

Technical Specification 6.8.1.a requires that written procedures and administrative policies be established, implemented, and maintained in accordance with the requirements and recommendations of Section 5.1 of ANSI N.18.7 - 1972.

Section 5.1 of ANSI N.18.7 - 1972 recommends that written policies be provided to control the issuance of documents, including changes, that prescribe activities affecting safety-related structures, systems, or components.

For the preparation of permanent plant changes or modifications (PC/M), paragraph 5.4.3 of QI 3-PTN-1, Design Control, requires that Department PC/M Coordinators review proposed Engineering Packages in accordance with the guidelines provided in Appendix C of this procedure. Additionally, for the final review and approval of PC/M packages, paragraph 5.5.2 of QI 3-PTN-1 requires that minimum quorum reviews, as determined by the Technical Department, also be performed in accordance with the guidelines provided in Appendix C of this procedure.

Appendix C of QI 3-PTN-1 provides for departmental review of PC/Ms for effects on procedures and requires the identification of the extent that applicable procedures are affected.

Contrary to the above, a design change involving the addition of fire header piping as reflected in PC/M 88-503 was not adequately incorporated into procedure 0-OSP-016.30, Annual Fire Main Post Indicator Valve (PIV) Leak Test and System Flush. This resulted in the inability to isolate and leak test a portion of the fire header piping during performance of Sections 7.1.15 and 7.1.16 of 0-OSP-016.30 on January 18, 1991.

#### RESPONSE TO FINDING

1. FPL concurs with the finding.
2. Plant Change and Modification (PC/M) 88-503 and procedure 0-OSP-016.30, "Annual Fire Main Post Indicator Valve (PIV) Leak

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Test and System Flush," were reviewed by the system specialist in the Fire Protection Group. The specialist, after reviewing the PC/M package in accordance with Quality Instructions 3-PTN-1, "Design Control," identified procedure 0-OSP-016.30 for change. Procedure 0-OSP-016.30 is employed by the plant at least once per year to flush the fire main system by channeling water through all portions of the Fire Main Loop along with cycling of the post indicator valves in the system. The specialist, however, did not ensure that the procedure revision reflected all the changes to the facility made by PC/M 88-503. The PC/M tied a new 10 inch fire header loop into the existing fire water system. The header was installed as part of the modifications for the Nuclear Entrance Building and the Mechanical Maintenance Building.

3. Corrective steps which have been taken and the results achieved:
  - a. The responsible fire protection member was counselled.
  - b. Procedure 0-OSP-016.30 was revised to incorporate the addition of the fire loop installed by PC/M 88-503. This was accomplished on January 19, 1991.
4. Corrective actions which will be taken to avoid further violations include:
  - a. Department instructions will be developed by the Nuclear Services Department for applicable groups in the department. The instructions will provide guidance and a checklist to ensure that department related PC/Ms are properly reviewed by the group and incorporated if necessary into their procedures.
5. The date when full compliance will be achieved:
  - a. Full compliance was achieved on January 19, 1991. Additionally, the long term corrective action discussed in 4.a will be completed by April 30, 1991.

