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 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251

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 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC ltr re violations noted in Insp rept
 50-250/91-11 & 50-251. Corrective actions: TP-644 revised to
 clarify reporting requirements & define temporary &
 permanent configuration changes.

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FPL

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

MAY 20 1991

L-91-139
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 No. 50-250 and 50-251
Reply to Notice of Violation
NRC Inspection Report 91-11

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

If there are any questions please contact us.

Very truly yours,

J. H. Goldberg
President Nuclear Division

JHG/DPS/ds

Attachment

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

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PDR ADOCK 03000250
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ATTACHMENT

REPLY TO A NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
NRC Inspection Report 91-11

FINDING

"Technical Specification (TS) 6.8.1 requires that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, and Sections 5.1 and 5.3 of ANSI N18.7-1972. Section 5.1.2 of ANSI N18.7 - 1972 requires that procedures be followed.

1. Procedure TP-644, Dual Unit Outage Configuration Control Notification, paragraph 3.1.3.2, requires a configuration control notice and a marked up figure, attachment F through J, notifying the Plant Supervisor - Nuclear of changes in plant configuration which are expected in the next 24 to 48 hours.

Contrary to the above, on March 11, 1991, TP-644 attachments F through J, which are located in the control room, had not been marked up to reflect the removal of the 3B 4KV bus at 12:23 pm on March 8, 1991 and the removal of the 4B 4KV bus at 12:40 pm on March 7, 1991.

2. Procedure ASP-23, General Installation Procedures for Electrical Raceways and Supports, paragraph 5.1.5 requires that the Project Field Engineer be responsible for ensuring all supports required are listed on attachment A of ASP-23. Procedure ASP-34, Preparation of Process Sheets and Installation Lists, paragraph 5.4 states that the Project Field Engineer is responsible for ensuring full implementation of Plant Change/Modification requirements by the preparation, review, approval, and revision of all installation lists.

Contrary to the above, on March 5, 1991, installation list 0466/88-418, Revision 0, and its associated attachment A had not been revised to reflect the requirement to reinstall temperature switch TS 6537A and its associated mounting support. TS 6537A and its mounting support had been previously removed on approximately February 28, 1991, to accommodate vital area barrier rework per Plant Change/Modification 88-418."



1. FPL concurs with the finding.

2. Example 1:

The reason for the event reported in Example 1 was inadequate procedural guidance in TP-644.

TP-644, Section 4.2.5 stipulates that the notification of Operations is necessary "... to alert the operations staff to changes in configuration ...". Since this event involved only the temporary removal of two power sources, this was thought to not constitute a configuration change. The change would therefore, not require a report to Operations.

The following requirements are also in TP-644:

Section 3.1.3.2, requires, "... a marked up figure, attachment F through J, ... of changes in plant configuration which are expected ..."

Section 2.2.7, requires, "... a mark up of the drawings shown on attachment H and J ... when ever changes to the Spent Fuel Cooling Flowpaths are anticipated ..."

The definition of an applicable configuration change was not clearly written in TP-644 to include temporary power removals. Therefore, the root cause of this violation was inadequate procedural guidance.

Example 2:

The reason for the event reported in Example 2 was cognitive personnel error by contractor non-licensed personnel. Contrary to the requirements of procedures ASP-23 and ASP-34, the Contractor Field Engineer failed to adequately update installation list 0466/88-418. This failure resulted in inadequate documentation of the temporary removal of a temperature sensor and its mounting bracket for a security barrier modification.

3. Corrective steps which have been taken and the results achieved:

Example 1:

- a. TP-644 was revised on April 12, 1991, to clarify the reporting requirements and define temporary and permanent configuration changes.



- b. Attachments F through J to TP-644, were marked up to reflect the removal of the 3B 4KV bus and the removal of the 4B 4KV bus on March 11, 1991.

Example 2:

- a. All Contractor Field Engineers, Contractor Superintendents and FPL Construction Supervisors have been trained on the proper use of Installation Lists and Process Sheets. This training stressed the importance of work controls for any Plant Modification Work Package.
- b. The Contractor Field Engineering group performed plant walkdowns that showed that this event was an isolated case and that no other similar conditions existed.
- c. Installation list 0466/88-418, Revision 0, and its associated attachment A were revised to reflect the requirement to reinstall temperature switch TS 6537A and its associated mounting support.
- d. These corrective actions were complete by March 26, 1991.

- 4. Corrective steps which will be taken to avoid further violations include:

Example 1:

- a. No additional corrective actions are considered to be necessary.

Example 2:

- a. Plant Management requested that FPL Quality Assurance (QA) perform an audit of construction practices and configuration control. The audit has been completed. The audit established that construction configuration control practices are satisfactory.

- 5. The date when full compliance will be achieved:

- a. Full compliance for Example 1 was achieved on March 11, 1991.
- b. Full compliance for Example 2 was achieved on March 26, 1991.

