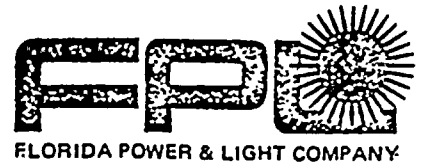


85 FEB 4 P12:59



January 28, 1985  
L-85-48

Mr. James P. O'Reilly  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street N.W., Suite 2900  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inspection Report 250-84-35 & 251-84-36

Florida Power and Light Company has reviewed the subject inspection report and a response is attached.

There is no proprietary information in the report.

Very truly yours,

J. W. Williams, Jr.  
Group Vice President  
Nuclear Energy Department

JWW/JA/ms/K1  
Attachment

cc: Harold F. Reis, Esquire.

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ATTACHMENT

Re: Turkey Point Units 3 and 4  
Docket No. 50-250, 50-251  
IE Inspection Report 84-250-35 and 84-251-36

FINDING 1:

10 CFR 50 Appendix B, Criterion XI, "Test Control", states, in part, that test results shall be documented and evaluated to assure that test requirements have been satisfied.

Licensee Quality Assurance Topical Quality Requirement 11, Section 11.2.3, Revision 1, and Quality Procedure 11.4, Revision 4, implement these requirements.

Contrary to the above, test results obtained during the performance of Operating Procedure (OP) 14004.2, "Reactor Coolant Flow Protection Channels - Periodic Test", performed on November 14, 1984, and OP 14004.4, "Pressurizer Pressure and Water Level Protection Channels - Periodic Tests", performed on November 15, 1984, were not documented or evaluated, in that protection bistable trip data was not recorded and consequently did not receive supervisory review or analysis. The failure to record bistable trip data is a programmatic oversight which has resulted in the completion of several additional periodic tests without a specific evaluation of the test results.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The normally expected values with acceptance criteria are printed in the procedure. Evaluation is done after the procedure is completed to ensure that all the steps were executed. Out-of-tolerance settings are documented in the QA Record Section. The procedures did not require documenting the "as-read" data.
- 3) The following procedures are being upgraded by the additions of columns to record the "as-found" data.

OP 14004.1 "Steam Generator Protection Channels"

OP 14004.2 "Reactor Coolant Flow Protection Channels - Periodic Test"

OP 14004.3 "TAVG and DELTA-T Protection Channels - Periodic Test"

OP 14004.4 "Pressurizer Pressure and Water Level Protection Channels - Periodic Test"

OP 1804.1 "Axial Flux Rod Deviation and Rod Position Indication System Monthly Test"

- 4) The Procedures Upgrade Program is chartered to rewrite Turkey Point Plant procedures. One of the improvements to procedures is the addition of columns for "as-found" data and "as-left" data. The FPL approved "Writers Guide for Maintenance Procedures", O-ADM-107, assures that when maintenance procedures are updated or new procedures are written, they are reviewed for including appropriate "as-found" and "as-left" data.
- 5) Full compliance for item 3 above will be achieved by March 15, 1985.

FINDING 2:

Technical Specification (TS) 4.10.1 requires periodic testing of the auxiliary feedwater (AFW) pumps to verify the ability of the system to respond properly when needed.

TS 4.10.2 requires that AFW discharge valves be tested during AFW pump tests.

TS 4.10.4 states that AFW tests shall be considered satisfactorily if control panel indication and visual observation of the equipment demonstrate that all components have operated properly.

Contrary to the above, the licensee did not perform the required visual observations necessary to verify that the AFW flow control discharge valves would operate as designed. These valves should open automatically in response to the opening of any steam supply valve, modulate as necessary to maintain flow and shut automatically when all the steam supply valves are shut. Additionally, the licensee failed to perform post test lineups on the AFW flow control valves and failed to independently verify the position of these valves.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The procedure was inadequate because it assumed that when the steam supply valve closed that the interlock would close the associated auxiliary feedwater control valve as designed.
- 3) Operating Procedure, OP 7304.1, "Auxiliary Feedwater System - Periodic Test" is upgraded to verify that the interlocks on the steam supply MOV operates the flow control valve open and closed per design. The procedure has been upgraded to include verification and independent verification of final flow control valve alignment and position.