FLORIDA POWER & LIGHT COMPANY

APR 1 1985

L-85-130

Dr. J. Nelson Grace
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
Suite 2900
101 Marietta Street N.W.
Atlanta, Georgia 30323

Dear Dr. Grace:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250, 50-251
Inspection Report 250-85-02 and 251-85-02

Florida Power & 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/SAV/js

Attachment

cc: Harold F. Reis, Esquire
PNS-LI-85-127v

ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket No. 50-250, 50-251
IE Inspection Report 250-85-02 and 251-85-02

**FINDING 1:**

Technical Specification (TS) 4.8.1.C requires that each diesel generator be demonstrated operable at least once each 18 months by verifying the diesel generator's capability to reject complete load without exceeding 4784 volts and without exceeding overspeed limits.

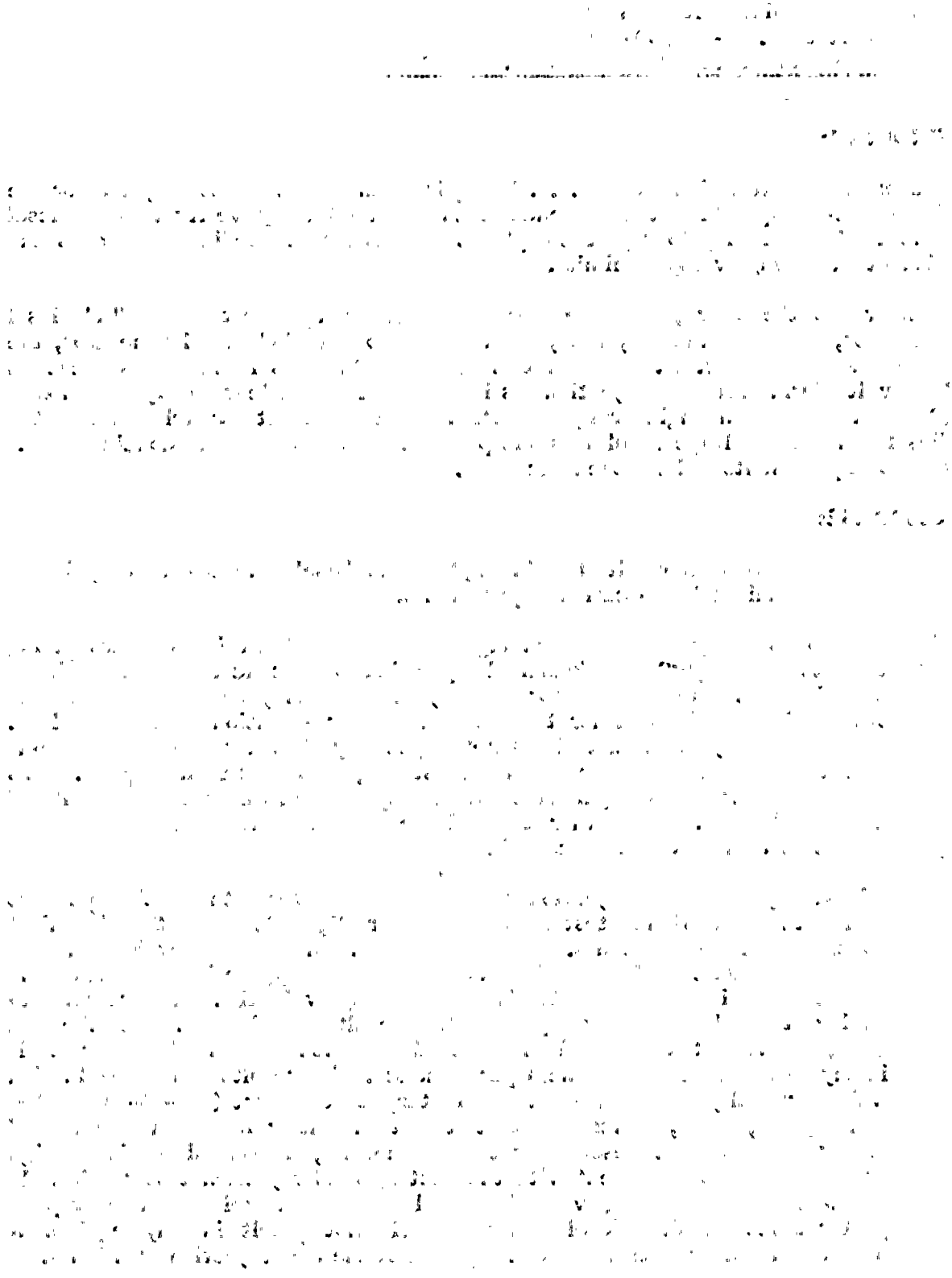
Contrary to the above, on December 22, 1984, during a test of the "A" diesel generator, and on January 4, 1985, during a test of the "B" diesel generator, the requirements of TS 4.8.1.C were not met, in that the diesel generators exceeded 4784 volts during full load rejection testing. The Plant Nuclear Safety Committee (PNSC) reviewed an engineering evaluation of the test data, concluded that the diesel generator voltage regulators had performed as designed and concluded that the TS requirements had not been exceeded.

**RESPONSE:**

1) FPL does not concur with the finding that the diesel generator testing did not meet Technical Specification requirements.

2) FPL does not agree with the finding, because it has been FPL's understanding that the Turkey Point Technical Specifications, concerning the voltage criteria during diesel generator load rejection testing, were based on steady state voltage values rather than maximum short-duration transient values. These load rejection criteria were adopted by FPL for the Turkey Point Technical Specifications based on NRC staff guidance at their request. This NRC staff surveillance guidance was not specific in this area in that it did not clearly identify whether the voltage criteria was a steady state or maximum transient voltage criteria.

   The steady state load rejection voltages measured for both diesel generators during the surveillance testing of December 22, 1984 meet the Technical Specification requirements. In addition, an engineering evaluation was performed which clearly demonstrates that appropriate design and operational criteria were met. This engineering evaluation was performed to analyze the voltage and overspeed testing results, obtained on December 22, 1984, to ensure that these did not exceed equipment design criteria or result in any degradation of equipment performance. The results of that evaluation which are fully documented in a Voluntary LER Report (250-84-040) dated January 22, 1985, concluded that the transient voltage and overspeed performance of both diesel generators was normal, meeting all original design criteria and was consistent with the factory load rejection test results. In addition, the engineering evaluation concluded that the voltage and overspeed performance of the diesel generators did not result in any equipment performance degradation as a consequence of the load rejection transients.



A separate engineering evaluation has been completed which reviewed the load rejection voltage, frequency, and overspeed criteria contained in Specification 4.8 and recommended revised criteria appropriate to the Turkey Point Emergency Diesel Generators for use in the diesel generator surveillance technical specifications. With the completion of this engineering evaluation, a revision to Technical Specification 4.8 will be initiated to incorporate the load rejection criteria developed during this engineering review.

The revision of Technical Specification 4.8 will be submitted to the NRC by May 1, 1985, as a part of those revisions to this Technical Specification in response to Generic Letter 84-15.

FINDING 2:

TS 4.10 requires that periodic testing of the Auxiliary Feedwater (AFW) system be performed to verify the operability of the system and its ability to respond properly when required. TS 4.10.4 requires that tests shall be considered satisfactory if control panel indication and visual observation of the equipment demonstrate that all components have operated properly.

Contrary to the above, prior to January 31, 1985, periodic testing of the AFW system was considered satisfactory without demonstrating that all system components operated properly, in that the installed safety-related AFW nitrogen system was not shown to be capable of supplying pneumatic control pressure to the AFW flow control discharge valves as designed.

RESPONSE:

1) FPL concurs with the violation and agrees that the AFW Backup Nitrogen System should be included in a periodic surveillance to demonstrate the operability of that AFW subsystem.

2) The reason for the finding was inadequate procedural guidance to control the operability surveillance of the AFW Backup Nitrogen System. In the past, the AFW backup nitrogen system was not considered as part of the operability acceptance criteria for the AFW system.

3) As an interim corrective measure, a temporary surveillance procedure has been developed to test the AFW Backup Nitrogen System in conjunction with inservice valve testing on a quarterly surveillance schedule. As part of this temporary quarterly surveillance procedure, the proper operation of the minimum nitrogen pressure annunciator alarm instrumentation will be verified. This temporary procedure has been PNSC approved for plant use.

## [illegible] Paper 230-11: [illegible] 31-32

[illegible]

[illegible]

### [illegible] 12:

[illegible]

[illegible]

### [illegible] 13:

1) [illegible]

2) [illegible]

[illegible]

4) a. Permanent corrective actions will take the form of a permanent surveillance procedure which will include the AFW Backup Nitrogen System. When approved, this permanent surveillance procedure will replace the temporary procedure discussed in Item 3 above.

b. The position of valves in the AFW Backup Nitrogen System will be verified on a monthly basis. To implement this commitment, these valves will be incorporated into the Operating Procedure 0103.19 Monthly Verification of Safety Related Systems Flowpaths.

c. FPL has implemented a Program for Improved Operation that was described in our letters L-84-265 dated September 28, 1984 and L-84-275 dated October 3, 1984. As part of the scope of this program, operability and acceptance criteria are being developed to ensure that adequate testing and acceptance criteria is available to meet the operability requirements as described in the FSAR and Technical Specifications.

5) a. Full compliance for Item 3 above was achieved on March 27, 1985.

b. Full compliance for Item 4a. above will be achieved by July 1, 1985.

c. Full compliance for Item 4b. above will be achieved by July 1, 1985.

FINDING 3:

TS 6.8.1 requires that written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of sections 5.1 and 5.3 of ANSI 18.7 - 1972 and Appendix "A" of USNRC Regulatory Guide 1.33.

Administrative Procedure (AP) 0190.19, "Control of Maintenance on Nuclear Safety Related and Fire Protection Systems," section 8.1.5 requires that a quality control review be conducted on all safety related plant work orders (PWO) prior to commencing maintenance work. Section 8.1.8 requires that a Quality Control Inspector certify the completion of the review by initialing the PWO.

Contrary to the above, on January 24, 1985, maintenance was begun on the "B" Emergency Diesel Generator using PWO 5090, which had not received a Quality Control review and was not approved by a Quality Control Inspector.

RESPONSE:

1) FPL concurs with the finding.

2) The reason for the incident was personnel oversight. FPL believes that this incident was not the result of a programmatic deficiency.

3) Upon discovery of the document deficiency, the immediate corrective actions taken on January 24, 1985 were the review and approval of the PWO 5090 by the Quality Control Department.

4) To prevent the reocurrence of a similar incident, the requirements of AP 0190.19 were reviewed with Electrical Supervisors, GEMS Planners, Chiefs, Temporary Relieving Chiefs, and Temporary Relieving Supervisors. Those individuals within the Electrical Maintenance Section responsible for generating and implementing plant work orders were cautioned to exercise greater care to ensure that all paperwork, procedures, parts, tools, etc. are proper to meet the requirements for the job before proceeding to accomplish the task. A review of this incident was presented to appropriate personnel within the other Maintenance Sections.

5) Full compliance for Item 4 above was achieved on February 5, 1985.