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SUBJECT: Forwards response to 870224 request for addl info re Generic Ltr 83-28.

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APRIL 17 1987

L-87-174

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
Generic Letter 83-28
Request for Additional Information
NRC TAC Nos. 52891, 52892, 53726, 53727, 55384, and 55385

Attached is our response to your February 24, 1987 request for additional information regarding Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events", Items 2.1 (Part 1), 2.2 (Part 1), and 4.3.

If there are any further questions, please call us.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

COW/TCG/gp

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator, Region II, USNRC
Mr. D. R. Brewer, USNRC Senior Resident Inspector, Turkey Point Plant

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REQUEST FOR ADDITIONAL INFORMATION
ITEM 2.1 (PART 1), 2.2 (PART 1) AND 4.3 T.S. OF GENERIC LETTER 83-28
EQUIPMENT CLASSIFICATION AND VENDOR INTERFACE
(REACTOR TRIP SYSTEM RELIABILITY TECHNICAL SPECIFICATION CHANGES)
TURKEY POINT PLANT, UNITS 3 AND 4

Question:

A. Item 2.1 (Part 1) "Equipment Classification (Reactor Trip System Components)"

The licensee's submittal states that they have determined that components whose functioning is required to trip the reactor are included in systems which are treated as safety-related. The submittal further indicates that the equipment classification at Turkey Point 3 and 4 is limited to the system level. A program to increase the specificity of the plant QList was said to be underway but no date was given for its completion. Subsequent submittals have not provided additional information regarding progress.

Based on the review of the licensee's submittals, we find that at the time of the submittal the licensee had not identified the safety-related components of the reactor trip system.

The licensee needs to confirm that all components whose functioning is required to trip the reactor are identified as safety-related on documents, procedures, and information handling systems used in the plant to control safety-related activities, including maintenance, work orders and parts replacement.

Response:

The Power Plant Engineering program for identification of safety classification for components at Turkey Point consists of three (3) main elements. These elements are the Turkey Point FSAR, Power Plant Engineering Quality Instructions, and a detailed list of components called the QList. When a component classification needs to be identified for the purpose of making a design change, the FSAR provides guidance as to the safety classification of the system. The FSAR contains a list of plant systems covered by the QA program (given in Chapter 1). Power Plant Engineering Quality Instructions also specifically identify the characteristics which determine whether a component is safety-related. As an additional source of safety classification information, the QList exists which can be used as a reference to find the safety classification of a specific component given the component tag number.

A detailed component level QList was implemented at Turkey Point as of December, 1986. All components are not included on the QList. The QList includes the electrical, electronic, electromechanical and mechanical components identified on Turkey Point drawings for safety-related systems including the reactor trip system components. (The QList does not generally include cables, panels, or supports, for example.) If a component is not on the QList, its safety classification can be determined by a safety classification evaluation in accordance with Power Plant Engineering Quality Instructions. Per

Power Plant Engineering Quality Instructions, a safety classification evaluation must be performed if:

1) the safety classification is not uniquely identified on the QList or other approved design output documents, or

2) a lower safety classification than set forth in the QList is desired.

The safety classification is also identified in the Total Equipment Data Base (TEDB) for the Turkey Point Plant. The TEDB was created to aid the management of maintenance activities by identifying information which was formerly stored in many manual lists and documents. This computerized system was developed using the plant drawings and other documentation and includes all items uniquely identified on all non-structural drawings. The TEDB does not include general construction items such as piping, pipe supports, conduit, cable trays, etc.

The TEDB can be accessed by the Nuclear Job Planning System (NJPS), a program for preparing and tracking Plant Work Orders (PWOs) from origination to closeout using the FPL mainframe computers. PWOs are the minimum documentation required for work on safety-related or quality related systems. The safety classification is printed on the PWO form via the computerized NJPS. Administrative Procedure 0-ADM-701, "Plant Work Order Preparation", which governs issuance of PWOs, requires the Job Planner to assure that the safety classification is correct by checking against the QList. The safety classification is also reviewed by a QC inspector to ensure it is correct prior to issuance of the PWO.

Overall guidance for work on safety-related systems is provided in Administrative Procedure 0190.19, "Control of Maintenance on Safety Related and Quality Related System". This procedure defines responsibilities, identifies applicable references, lists the requirements for records and notifications, provides instructions for job planning, QC prereview, work completion and troubleshooting and testing, and defines hold point criteria.

B. <u>Item 2.2 (Part 1) "Equipment Classification (Programs For All Safety-Related Components)"</u>

1. <u>Item 2.2.1 - Program</u>

The licensee's response does not confirm that all safety-related components are designated as safety-related on plant documents such as procedures, system descriptions, test and maintenance instructions, operating procedures, and in information handling systems so that personnel performing activities that affect such safety-related components are aware that they are working on safety-related components and are guided by safety-related procedures and constraints.

The licensee needs to state that their equipment classification conforms to the above staff position. If all safety-related components are not designated as safety-related on the relevent documents, the licensee should specifically describe the exceptions and provide a justification for such exceptions for staff review.

2. Item 2.2.1.2 - Information Handling System

The licensee's responses do not confirm that the information handling system includes a complete list of safety-related equipment and that procedures exist which govern its development and validation.

The licensee needs to make the above confirmation.

3. Item 2.2.1.3 - Use of the Equipment Classification Listing

The licensee's response has not confirmed that criteria and procedures exist which govern the use of the information handling system to determine that an activity is safety-related and what procedures for maintenance, surveillance, parts replacement and other activities defined in the introduction to 10 CFR 50, Appendix B, apply to safety-related components.

The licensee needs to state that their program contains provisions to govern the use of the information handling to assure that a safety-related activity is identified as safety-related and that the proper procedures are selected and implemented.

4. Item 2.2.1.5 - Design Verification and Procurement

The licensee's response does not confirm that their procurement specifications require that the appropriate design verification and qualification testing be provided by the supplier.

The licensee needs to state that their procurement specifications conform to the above staff position.

Response:

B.1 The FSAR, Engineering Quality Instructions, and the QList provide guidance and ensure that engineers are aware of the safety classification of components involved in Plant Change/Modification Packages. The response to question A describes this process in detail.

If the classification of a component can not be easily determined from the FSAR or the QList, a component safety classification evaluation is performed. The requirements for performing this evaluation are documented in Power Plant Engineering Quality Instructions.

As stated in the response to question A, work is controlled for safety-related components in accordance with Administrative Procedure 0190.19.

B.2& B.3 The TEDB includes the component safety classification, which is based on the QList classification. The TEDB is a living document and is to be maintained by review of revisions to various plant documents (among them the QList) and by feedback from plant personnel. The safety classification in the TEDB and listed on a PWO is required to be confirmed by comparing it to the QList before a PWO is used for work on a safety-related system (Administrative Procedure 0-ADM-701).

Administrative Procedures 0190.19 governs work on safety related equipment. It provides general guidlines for maintenance controls for safety-related, quality related, and environmentally qualified systems, components, and equipment to ensure that a safety-related activity is identified as safety-related and that the proper procedures are selected and implemented.

B. 4 Power Plant Engineering Quality Instructions and Site Quality Control Department Instructions require that procurement specifications for Safety Related purchases include appropriate design verification and qualification testing requirements.

Administrative Procedure AP-0190-4, Procurement Document Control, provides the methods for control of procurement documents originated at the plant level and ensures local implementation of Quality Procedure 4.1, Control of Requisitions and the Issuance of Purchase Orders for Spare Parts, Replacement Items and Services, of the QA Manual. As stated in our previous response dated November 8, 1983 (L-83-555), QP 4.1 provides a system to assure that the appropriate technical and quality requirements are placed upon suppliers who provide material, equipment, and services for FPL nuclear plants.

Question:

C. Item 4.3 T.S. - Reactor Trip System Reliability, Technical Specification Changes

The licensee needs to submit proposed Technical Specification changes for the reactor trip logic and reactor trip breakers consistent with Generic Letter 85-09.

Response:

Proposed technical specifications were submitted as part of the Turkey Point Plant Technical Specification upgrade effort on September 29, 1986 (FPL Letter No. L-86-393).