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AUTH. NAME AUTHOR AFFILIATION
WOODY, C. O. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Repts 50-250/87-41 & 50-251/87-41. Corrective actions: startup dept organized to be responsible for sys acceptance walkdowns & testing.

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FPL

NOVEMBER 12 1987

L-87-466

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
Inspection Report 87-41

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,

C. O. Woody
Group Vice President
Nuclear Energy Department

COW/SDF/gp

Attachment

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

IE01
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SDF1/056/1

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NO. 50-250, 50-251
IE INSPECTION REPORT 250-87-41 & 251-87-41

FINDING:

10 CFR 50 Appendix B, Criterion XI, as implemented by Florida Power and Light Topical Quality Assurance Report FPLTQAR 1-76A and TQR 11.0, entitled Test Control, requires in part that testing be performed to assure that structures, systems, and components be tested following modification to assure satisfactory performance in service.

Contrary to the above, modifications performed in 1981-1982 designated as PC/M 80-51, PC/M 80-52, PC/M 80-167, and PC/M 80-168 were not tested under routine surveillance procedures until September 2, 1987.

RESPONSE:

1) FPL concurs with the finding.

2) The reason for the finding was that post-modification testing was governed under the existing construction administrative procedures, with no single organization being accountable for the documentation of the testing being performed. A portion of the testing in this time frame was performed by the cognizant maintenance departments. These tests were documented on Plant Work Orders, (PWO's), however the PWO's did not necessarily reference the PC/M being implemented. This has made the retrieval of any testing which was performed by PWO's extremely difficult.

3) A documentation search was initiated to locate any testing which may have been performed. The search covered the original PC/M's and related construction documents. Concurrently, testing of the Normal Containment Cooler (NCC) modifications, Containment Sump Pump (CSP) modifications, and certain containment isolation valves was initiated. It was determined that CV-2201 did not require any additional testing as procedures 3/4-OSP-203, "Integrated Safeguards Test", adequately tested this valve. The search failed to identify any documentation of the required testing. Testing of the above components was performed satisfactorily on both units, except for the Unit 4 NCC's, which failed to trip upon receipt of a Containment Isolation Phase A (CIA) signal. This failure did not result in a condition which would have initiated a restart of the NCC upon a post-safeguards-initiation reset of the CIA signal.

4) Since the time the cited PC/M's were implemented, FPL has instituted major improvements in assuring and controlling post-modification testing. These include:

a) Revision of Quality Instruction 3.1, "Control of Design Performed by JPE", to require engineering design packages to contain a startup testing section. That section provides guidelines for startup testing procedures as recommended by manufacturers, required by Technical Specifications, or desired by engineering. Testing requirements must be specified in the design package when necessary to assure the modification does not alter the plant's design basis.

b) A Startup Department was organized as part of the Performance Enhancement Program (PEP). That department is responsible for system acceptance walkdowns, system acceptance testing and other duties to assure a system will work as designed before being turned over to the plant for operation.

c) Administrative Procedure AP 0190.15, "Plant Changes and Modifications", requires the plant technical staff perform an engineering review following a PC/M implementation and that quality control perform a post-implementation review.

d) 3/4-OSP-203, "Engineered Safeguards Integrated Test", has been revised to require train-by-train safeguards tests to assure proper function of components powered by Telemand transferred Motor Control Centers.

5) a) Full compliance for item 3 above was achieved by September 2, 1987.

b) Full compliance for item 4 above was achieved by October 31, 1987.