

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 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 50-250/87-39 &
 50-251/87-39. Corrective actions: fuse insp expanded to
 include nuclear instrumentation, qualified safety parameter
 display & post accident sampling sys for both units.

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NOVEMBER 25 1987
L-87-489

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 87-39

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
Executive Vice President

COW/SDF/gp

Attachment

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

SDF/IR.004

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an FPL Group company

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ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NO. 50-250, 50-251
IE INSPECTION REPORT 250-87-39 & 251-87-39

FINDING A:

Technical Specification (TS) 6.8.1 requires that written procedures and administrative policies shall be established, implemented, and maintained to meet or exceed the requirements and recommendations of sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33.

ANSI N18.7-1972, section 5.1, specifies in part that maintenance affecting the performance of safety-related equipment shall be performed in accordance with written procedures or documented instructions appropriate to the circumstances.

Maintenance procedures (MPs) 0707.16 through 0707.20 dealing with the repair and calibration of reactor safeguards protection circuitry, specify the size and type of fuses to be installed in the respective circuits.

Contrary to the above, fuse inspections performed during the week of September 14, 1987, revealed that numerous fuses installed in the reactor protection circuitry did not match the procedurally specified fuses in either size or type.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was that the maintenance procedures specifying the fuse sizes are for the repair of failed Hagan protection modules, and are not used for routine fuse replacement. It is believed that the fuses were installed during maintenance activities that did not involve actual failed module repair.
- 3) a) The fuses in the engineered safety feature (ESF) protection racks for Unit 3 and Unit 4 will be inspected and brought into conformance with approved plant procedures.

b) In addition, the fuse inspection has been expanded to include the nuclear instrumentation, qualified safety parameter display, and post accident sampling systems for both units.
- 4) a) The as found condition of the fuses will be evaluated by our engineering department to determine the safety significance. Also as a result of the observed differences, our engineering department will evaluate the Reactor Protection System Hagan module fuse specifications in the existing maintenance procedures to validate that the fuse sizes and types specified are acceptable.

b) An administrative procedure is currently being reviewed that will provide guidance for the administrative control of fuse replacement.



- 5) a) Full compliance for item 3 above will be achieved by January 29, 1988.
- b) Full compliance for item 4 above will be achieved by February 29, 1988.

FINDING B:

10 CFR 50, Appendix B, Criterion V, as implemented by Florida Power and Light Topical Quality Assurance Report FPLTQAR 1-76A, Revision 10, and TQR 5.0, Revision 6, entitled Instructions, Procedures and Drawings, requires in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures and drawings.

FINDING B.1:

Non-Conformance Report (NCR) C-655-87, specifies that an electrical wire splice for steam flow transmitter FT-3-475 be repaired in accordance with procedure 5610-E-1593/87-093, Revision 0, entitled Acceptance Criteria and Installation Details for Raychem Splices. Section 8.0 of the procedure specifies, in part, that post maintenance functional tests shall be performed on instrument loops receiving wire splice repairs or replacements.

Contrary to the above, subsequent to the repair of wire splice 3IFSGS/T3I22-FT475/1, instrument loop FT-3-475 did not receive a functional test. Subsequently, the instrument loop was determined to be inoperable due to a wire discrepancy.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was procedural inadequacy. FT-3-475 was worked on as a part of plant change/modification (PC/M) 87-93, Acceptance Criteria and Installation Details for Raychem Splices. The electrical splices were worked as per the PC/M and turned over as a partial turnover. The post modification testing was done on May 19, 1987. Subsequent inspection identified a bend radius that did not meet the acceptance criteria of the PC/M. A nonconformance report (NCR) was issued for engineering review and determination of appropriate corrective actions. The NCR was dispositioned and the repairs completed. During this work the leads at the transmitter were rolled. After the work was completed, no turnover was made because the governing procedures did not specifically require it to be done.
- 3) The leads at the transmitter for FT-3-475 were returned to their proper configuration and the transmitter tested satisfactorily.
- 4) Administrative Site Procedure (ASP) ASP-8, Corrective Action, will be revised to require that any discrepancy report or NCR requiring work that includes specific testing requirements, affects a system pressure boundary, or mechanically or electrically alters a system after acceptance shall be routed to the Start Up Department for appropriate testing requirements.
- 5) a) Full compliance for item 3 above was achieved by September 22, 1987.



b) Full compliance for item 4 above was achieved by November 18, 1987.

FINDING B.2:

Plant Change Modification (PCM) 85-175, entitled Unit 3 Auxiliary Feedwater Nitrogen Station Additions and Relocation, specifies in drawing 5610-J-558, Revision 2, that a train check valve requiring 0.33 pounds per square inch (psi) differential to seat the disc be installed adjacent to pressure regulator 1706.

Contrary to the above, in September 1987, subsequent to system installation, inspection and testing, a check valve requiring 10.0 psi differential to seat the disc was found to be installed adjacent to pressure regulator 1706.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was personnel error. There are two contributing factors for the error. The first factor is that the spare 10 psi valves were removed from the warehouse. By having the spares in the field, the chance for error was magnified. The second factor is the physical size of the valve, its labeling, and the design configuration. The .33 psi valve and the 10 psi valve are physically identical externally in that they look the same except for the small decal which indicates the pressure rating. By installing the valve so that the flow direction arrow is visible, it is very difficult to read the pressure rating label. These two factors resulted in an inspection error that allowed an incorrect check valve to be installed.
- 3) The check valves installed on both trains of backup nitrogen for the auxiliary feedwater flow control valves on both units were replaced. The new valves will be labeled to provide positive permanent valve identification.
- 4) A training session was held with the affected groups to discuss this finding, the reason for occurrence, and the importance of thorough inspections to ensure no recurrence of this type of finding.
- 5) a) Full compliance for item 3 above was achieved by November 9, 1987.
b) Full compliance for item 4 above was achieved by November 19, 1987.

