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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: CONWAY, W.F.
 AUTHORITY AFFILIATION: Florida Power & Light Co.
 RECIPIENT NAME: RECIPIENT AFFILIATION

Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 880525 ltr re violations noted in Insp Repts
 50-250/87-47 & 50-251/87-47.

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 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

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JUNE 24 1988

L-88-272

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Dockets Nos. 50-250 and 50-251
Reply to Notice of Violation
Inspection Report 87-47

Florida Power & Light Company has reviewed the Notice of Violation issued in the Nuclear Regulatory Commission letter dated May 25, 1988 and our response is attached. Pursuant to this letter, the implementation date for the 24 hour FPL supervision of the contractor security force has also been improved.

The process of adding five new positions to provide the necessary FPL management interface with the contractor security force has commenced. Three of the positions have been filled, and additional candidates to fill the remaining positions are in the interview process. It is expected that the new positions will be filled by September 1, 1988.

Very truly yours,


W. F. Conway
Senior Vice President - Nuclear

WCF/SDF/gp

Attachments

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

SDF87-47.IR

TEO1 Add: NRR/DRIS/SGB Ltr Encl
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an FPL Group company

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NO. 50-250, 50-251
IE INSPECTION REPORT 250-87-38/47 & 251-87-38/47

FINDING:

10 CFR 50.9 requires that information provided to the Commission by a licensee shall be complete and accurate in all material respects.

Contrary to the above, Florida Power & Light Company's March 14, 1988 response to a Notice of Violation and Proposed imposition of Civil Penalty, issued February 11, 1988, stated that corrective actions concerning the 7-day operability check of locks and a routine preventive maintenance program had been completed by March 12, 1987. In a subsequent response, dated March 29, 1988, Florida Power and Light stated that the preventive maintenance program for the locks had not been accomplished until March 28, 1988.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The cause of the inaccurate information was personnel error and the use of an inadequate process for the preparation of the initial response to the violation. The process permitted the use of undocumented information during the preparation of the response. This resulted in information which was inaccurate. Turkey Point performs a verification process of responses to violations. This verification process failed to identify this inaccuracy, due to the belief that the periodic surveillance performed on the lock constituted preventive maintenance.
- 3) The Company Nuclear Review Board (CNRB) subcommittee initiated an evaluation shortly after the inaccuracies were discovered. This evaluation resulted in the actions described below.
- 4) Procedures will be revised or a new procedure will be generated, as appropriate, to address the handling of responses to NRC violations. The new process will require that all completed actions be documented prior to the issuance of a violation response to the NRC. The documentation will be accompanied by a Certificate of Completion signed by the parties responsible for their completion. Additionally, the completed actions will be reviewed to assure that they properly address the violation. The procedure will also identify the responsibilities of the affected departments and the routing and approval path for responses.
- 5) a) The evaluation discussed in item 3 above was completed on April 21, 1988.
b) Full compliance for item 4 above will be achieved by September 1, 1988.

