

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8907110357 DOC. DATE: 89/07/07 NOTARIZED: NO DOCKET #  
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
 AUTH. NAME: WOODY, C.O. AUTHOR AFFILIATION: Florida Power & Light Co.  
 RECIPIENT NAME: RECIP. NAME: Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Rept 50-250/89-22.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3  
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

## NOTES:

	RECIPIENT		COPIES			RECIPIENT		COPIES	
	ID CODE/NAME	PD2-2 PD	LTR	ENCL		ID CODE/NAME	LTR	ENCL	
INTERNAL:	AEOD		1	1		EDISON, G	1	1	
	AEOD/TPAD		1	1		AEOD/DEIIB	1	1	
	NRR SHANKMAN, S		1	1		DEDRO	1	1	
	NRR/DLPQ/PEB		1	1		NRR/DEST DIR	1	1	
	NRR/DREP/EPB 10		1	1		NRR/DOEA DIR 11	1	1	
	NRR/PMAS/ILRB12		1	1		NRR/DREP/RPB 10	2	2	
	OE-LIEBERMAN, J		1	1		NUDOCS-ABSTRACT	1	1	
	REG FILE 02		1	1		OGC/HDS2	1	1	
	RGN2 FILE 01		1	1		RES MORISSEAU, D	1	1	
INTERNAL:	LPDR		1	1		NRC PDR	1	1	
	NSIC		1	1					

## NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,  
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION  
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 23 ENCL 23

R  
I  
D  
S  
/  
A  
D  
D  
S  
  
R  
I  
D  
S  
/  
A  
D  
D  
S





FPL

P.O. Box 14000, Juno Beach, FL 33408-0420

JULY 7 1989

L-89-229  
10 CFR 2.201

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

Gentlemen:

Re: Turkey Point Unit 3  
Docket No. 50-250  
Reply to Notice of Violation  
Inspection Report 89-22

Florida Power & Light Company (FPL) has reviewed the subject inspection report and pursuant to 10 CFR 2.201 the response is attached.

Very truly yours,

*R. J. Cooney*  
C. O. Woody

Acting Senior Vice President - Nuclear

COW/JRH/cm

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

8907110357 890707  
PDR ADOCK 05000250  
Q FDC

an FPL Group company

1501  
11



## Finding

Technical Specification 6.8.1 requires that written procedures and administrative policies shall be established, implemented and maintained that 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 5.3, and Appendix A of Regulatory Guide 1.33 require that modification and/or repair of safety-related equipment be performed in accordance with written procedures and instructions. Step 28.0 of Process Sheet 89-113 for plant change/modification (PCM) 89-067 (J-12 Thimble Guide Repair), Step 28.0 of Process Sheet 89-377 for PCM 89-267 (J-5 and J-15 Thimble Guide Repairs) and Step 34 of Process Sheet 89-423 for PCM 89-297 (J-3 Thimble Guide Repair) require Quality Control inspection personnel to witness cutting of the thimble guide conduits. Paragraph 4.12 of FP&L Administrative Site Procedure ASP-34, Preparation of Process Sheets and Installation Lists defines witness to watch over, observe, or visually examine a specific work operation or activity which is performed by others. Work may proceed only to the point at which the specified work activity would begin.

Contrary to the above, the cutting of thimble guide conduits J-3 (PCM 89-297), J-5 (PCM 89-267), J-12 (PCM 89-067), and J-15 (PCM 89-267) was not witnessed by quality control inspection personnel as required.

## Response

- 1) FPL concurs with the finding.
- 2) Quality Control did not witness the cutting of the thimble guide conduits J-3 (PCM 89-297), J-5 (PCM 89-267), J-12 (PCM 89-067), and J-15 (PCM 89-267) due to inadequate procedures (i.e. Process Sheets). The Process Sheets that were controlling the work provided for witnessing the following activity: Using a pipe cutter, and being careful not to damage the thimble, cut the thimble guide conduit approximately 5 feet below the bottom of the seal table and visually inspect to verify that the thimble is not damaged. The field QC Inspectors interpreted the witness activity to require QC to be present only to visually inspect to verify that the thimble was not damaged.
- 3) a) A training brief to clarify the definitions of certain inspection activities (i.e. Hold Point, Inspect, Surveillance, and Witness) was issued to field personnel (i.e. FPL Supervisors, Bechtel Superintendents, Field Engineers, craft personnel, and QC Inspectors).



- b) Administrative Site Procedure, ASP-34, "Preparation of Process Sheets and Installation Lists," was revised to clarify the inspection activity definitions.
- 4) No further corrective actions are necessary to prevent recurrence.
- 5) a) The training brief (Item 3a) was issued on May 4, 1989.  
b) The revision to ASP-34 (Item 3b) was approved on May 19, 1989, and training on the revision was completed on June 21, 1989.

