

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8909120388 DOC. DATE: 89/09/01 NOTARIZED: NO DOCKET #
 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: WOODY, C.O. AUTHOR AFFILIATION: Florida Power & Light Co.
 RECIP. NAME: RECIP. AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Repts 50-250/89-27 & 50-251/89-27.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

| | RECIPIENT ID CODE/NAME | | COPIES | | | RECIPIENT ID CODE/NAME | | COPIES | |
|-----------|------------------------|----|--------|------|--|------------------------|---|--------|------|
| | | | LTTR | ENCL | | | | LTTR | ENCL |
| | PD2-2 | PD | 1 | 1 | | EDISON, G | 1 | 1 | |
| INTERNAL: | AEOD | | 1 | 1 | | AEOD/DEIIB | 1 | 1 | |
| | AEOD/TPAD | | 1 | 1 | | DEDRO | 1 | 1 | |
| | LOIS, ERASMIA | | 1 | 1 | | NRR SHANKMAN, S | 1 | 1 | |
| | NRR/DEST DIR | | 1 | 1 | | NRR/DLPQ/PEB | 1 | 1 | |
| | NRR/DOEA DIR 11 | | 1 | 1 | | NRR/DREP/EPB 10 | 1 | 1 | |
| | NRR/DREP/RPB 10 | | 2 | 2 | | NRR/PMAS/ILRB12 | 1 | 1 | |
| | NUDOCS-ABSTRACT | | 1 | 1 | | OE LIEBERMAN, J | 1 | 1 | |
| | OGC/HDS2 | | 1 | 1 | | REG FILE 02 | 1 | 1 | |
| | RES MORISSEAU, D | | 1 | 1 | | RGN2 FILE 01 | 1 | 1 | |
| EXTERNAL: | 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: LTTR 24 ENCL 24

R
I
D
S
/
A
D
D
S





SEPTEMBER 1 1989

L-89-325
10 CFR 2.201

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
Reply to Notice of Violation
Inspection Report 89-27

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,

C. O. Woody
for 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

8909120388 890901
PDR ADOCK 05000250
Q FDC

IE01
11



ATTACHMENT

RE: Turkey Point Units 3 and 4
Docket Numbers 50-250 and 50-251
NRC Inspection Report 89-27

FINDING A

TS 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 Appendix A of USNRC Regulatory Guide 1.33 and Sections 5.1 and 5.3 of ANSI N18.7-1972. Administrative Procedure O-ADM-209, Equipment Tagging and Labeling, provides the responsibilities, precautions, limitations and instructional guidance for establishing and maintaining an accurate, complete and effective plant tagging program.

Contrary to the above, engraved label plates were replaced on the Unit 3 Safety Injection Block Switch without following the requirements of Administrative Procedure O-ADM-209, resulting in two separate safeguard actuations within a 24-hour period.

RESPONSE A

1. FPL concurs with the finding.
2. The cause for this finding was personnel error by non-licensed utility personnel. The label on the Safety Injection Block Switch had been recently replaced with a label which contained more detailed information. Both the person responsible for validating the label and the person who installed the label for the Safety Injection Block Switch failed to adequately validate all the information contained on the new label. The new label installed had the "Blocked" and "Unblocked" switch positions reversed. This resulted in the switch being placed unknowingly in the "Unblocked" position instead of the "Blocked" position. With the switch in the "Unblocked" position, when the manual block buttons were released, an SI signal was produced.

An unclear drawing was the reason the inaccurate label was not identified following the first SI actuation. The I&C technician was required by the Plant Work Order for this activity to verify that the switch had proper continuity in the block, neutral, and unblock positions. When he performed this step, confusing information on drawing 5610-M-430-171, Sheet 5, "Units 3 and 4 Safeguards System," lead the technician to believe that the switch was responding correctly. This resulted in the inaccurate label not being



identified. Two switch contact blocks which showed signs of physical damage were considered to be the cause of the first SI actuation.

3. Corrective steps which have been taken and the results achieved include:
 - a. The Unit 3 Safety Injection Block Switch has been relabeled to correctly identify switch positions.
 - b. The Safety Injection Block Switch labels in the Simulator and in the Unit 4 Control Room have been verified to be correct.
4. Corrective steps which will be taken to avoid further violations include:
 - a. The individual responsible for validating the tag, and the individual responsible for placing the tag were counseled. This counseling stressed the importance of verifying the information contained on tags before they are installed.
 - b. Administrative Procedure O-ADM-209 has been revised to require independent verification by a Reactor Control Operator of the accuracy of information on new tags being installed in the Control Room.
 - c. Drawing 5610-M-430-171, Sheet 5 has been revised to remove confusion related to the switch nomenclature orientation.
5. Date when full compliance will be achieved:
 - a. Action item 3.a was completed on June 23, 1989.
 - b. Action item 3.b was completed on June 23, 1989.
 - c. Action item 4.a was completed on June 23, 1989.
 - d. Action item 4.b was completed on July 7, 1989.
 - e. Action item 4.c was completed on August 15, 1989.

FINDING B

10 CFR 50, Appendix B, Criterion III, as implemented by the approved Florida Power and Light Company Topical Quality Assurance Report (FPLTQAR) 1-76A, Revision II, Topical Quality Requirement (TQR) 3.0, Revision 7, requires that measures be established to assure that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures, and instructions.

Contrary to the above, the required 2.0 second opening time specified for the Pressurizer Power Operated Relief Valve (PORV) in the Overpressure Mitigating System (OMS) Safety Evaluation Report dated March 14, 1980, was not incorporated into the licensee's Inservice Testing Program. Instead, a non-conservative acceptance criteria of 15.0 seconds was used. This resulted in the Unit 3 and 4 PORVs being unable to maintain Reactor Coolant System (RCS) pressure



below the 10 CFR 50, Appendix G limits, had the most limiting design basis transient occurred. This condition existed on several occasions from May 1984 to June 1988, as exhibited by a review of PORV stroke timing records.

RESPONSE B

1. FPL concurs with the finding.
2. The cause for this finding was an inadequate design process. The process did not verify that the design basis opening time of 2.0 seconds for the PORVs could be met by the PORVs installed at Turkey Point, nor did the process assure that the proper acceptance criteria was incorporated into the Plant's affected documents.
3. Corrective steps which have been taken and the results achieved include:
 - a. Westinghouse has performed an evaluation of the increased PORV stroke times against each of three overpressure events (inadvertent start of two charging pumps with a loss of letdown, spurious start of one safety injection pump, and inadvertent starting of a RCP with a temperature differential between the secondary system and the RCS of 50 degrees F). The mass injection pressure transient of a spurious start of a single safety injection pump has been determined to be the most limiting pressure transient event. The final results showed that the PORVs could be tested up to 3.45 seconds and still prevent the most limiting pressure transient from exceeding 10CFR50, Appendix G limits.

For the case of two charging pumps starting with a loss of letdown and of inadvertent starting of a RCP with a temperature differential between the secondary system and the RCS of 20 degrees F (Turkey Point operating procedures specify 10 degrees F), the Westinghouse evaluation demonstrated that PORV opening stroke times would have to exceed 10.0 seconds before the limits of 10CFR50, Appendix G would be approached.

- b. Plant Change/Modification (PC/M) 88-535 has been issued to increase the size of the Unit 4 PORV instrument air and nitrogen backup supply line tubing. This PC/M has been implemented and was demonstrated to be effective in decreasing the PORV opening time through performance of Preoperational Procedure 0800.216, "Pressurizer PORV Nitrogen Backup and Timing." This procedure requires an opening time of 1.65 to 3.45 seconds and a closing time of 1.0 to 2.0 seconds using both instrument air and nitrogen backup supplies.
 - c. PC/M 88-427 has been issued to increase the size of the Unit 3 PORV instrument air supply line tubing as a temporary measure to decrease the PORV opening stroke time. This PC/M has been implemented and was demonstrated to be effective through performance of Startup Field Procedure SFP-13, "Startup Test Control - Interim Departmental Testing." Permanent modifications to the PORV instrument air and nitrogen backup supply line tubing will be implemented on the Unit 3

PORVs prior to restart from the next refueling outage. Compensatory measures are in place as a condition of NRC Discretionary Enforcement to allow continued Unit 3 operation with PORV opening stroke times of less than or equal to 10.0 seconds until these permanent modifications are completed.

- d. Operating Procedure OP 0209.1, "Valve Exercising Procedure," provides instructions for the periodic exercising of Safety Class 1, 2, and 3 valves for which exercising is required by the Valve Test Program portion of the Turkey Point Inservice Testing Program. This procedure has been revised to ensure the Unit 4 PORVs meet an opening stroke time of 3.45.
- e. OP 0209.1 has been revised to ensure the Unit 3 PORVs meet an opening stroke time of less than or equal to 10.0 seconds. OP 0209.1 will be revised to specify an opening stroke time of 3.45 seconds for the Unit 3 PORVs upon completion of long term corrective modifications during the next refueling outage.
- f. Operations Surveillance Procedure 4-OSP-041.4, "Overpressure Mitigating System Nitrogen Backup Leak and Functional Test," has been revised to ensure the Unit 4 PORVs meet an opening stroke time of 3.45 seconds using the nitrogen backup supply.
- g. Procedure 3-OSP-041.4 has been revised to ensure the Unit 3 PORVs meet an opening stroke time of less than or equal to 10.0 seconds using the nitrogen backup supply. 3-OSP-041.4 will be revised to specify an opening stroke time of 3.45 seconds for the Unit 3 PORVs using the nitrogen backup supply upon completion of long term modifications during the next refueling outage.

4. Corrective steps which will be taken to avoid further violations include:

- a. Administrative Procedure (AP) 0103.18, "Facility Operating License Amendments and/or Changes," has been revised to require the Nuclear Engineering Department personnel to document the review of proposed license amendments and provide a response to the Regulation and Compliance Group.
- b. Nuclear Engineering Quality Instruction (QI) 3.11, "JPN Review of Technical Specification Amendments," has been issued which requires the review of technical specification amendments for impact on engineering design documents.

5. Date when full compliance will be achieved:

- a. Action item 3.a was completed on March 2, 1989.
- b. Action item 3.b was completed on March 2, 1989.
- c. Action item 3.c will be complete prior to startup from the next Unit 3 refueling outage which is currently scheduled for May 31, 1990.
- d. Action item 3.d was completed on February 24, 1989.



- e. Action item 3.e will be complete prior to startup from the next Unit 3 refueling outage which is currently scheduled for May 31, 1990.
- f. Action item 3.f was completed on May 2, 1989.
- g. Action item 3.g will be complete prior to startup from the next Unit 3 refueling outage which is currently scheduled for May 31, 1990.
- h. Action item 4.a was completed on November 28, 1988.
- i. Action item 4.b was completed in December 1988.

