

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8912050052 DOC. DATE: 89/11/22 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 AUTHOR AFFILIATION
 GOLDBERG, J.H. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Repts 50-250/89-43 &
 50-251/89-43.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES 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
	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/DRIS/DIR	1 1	NRR/PMAS/ILRB12	1 1
	NUDOCS-ABSTRACT	1 1	OE LEEBERMAN, J	1 1
	OGC/HDS2	1 1	<u>REG FILE</u> 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





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

NOVEMBER 22 1989

L-89-423

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 89-43

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,

J. H. Goldberg
Executive Vice President

JGH/JRH/rh

Attachment

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

8912050052 891122
FDR ADOCK 05000250
Q FDC

IE01
1/1



ATTACHMENT

RE: Turkey Point Units 3 and 4
Docket Numbers 50-250 and 50-251
NRC Inspection Report 89-43

FINDING

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.

NRC Regulatory Guide 1.33, Appendix A, item 1, specifies that procedures should be written for equipment control.

Section 5.1.2 of ANSI N18.7-1972 requires that procedures be followed.

Administrative Procedure 0103.4, In-Plant Equipment Clearance Orders, dated July 27, 1989, specified that In-Plant Equipment Clearance Orders shall be required for the safety and protection of plant personnel and equipment.

Contrary to the above, clearance number 4-89-09-069 was inadequate on September 20, 1989, in that MOV-4-1420 was not fully isolated. This allowed the line to remain pressurized which caused the valve stem to be ejected resulting in serious injury to a plant electrician.

RESPONSE

1. FPL concurs with the finding.
2. The reason for the violation was inadequate training for the task at hand. When the job scope on Motor Operated Valve (MOV)-4-1420 expanded from replacing the motor operator to replacing the actuator stem drive sleeve lock-nut, clearance requirements were not re-evaluated by Electrical Department personnel. It was assumed that because the initial clearance identified the subject valve as being "isolated" the system pressure had been relieved.

The Electrical Maintenance Department had received valve actuator training approximately 18 months prior to the accident. The Chief Electricians had the mechanical section of the training but remembered precautions concerning system pressure only after the accident occurred. In addition, the Chief Electrician and electrical crew had no practical experience in working with piping systems.

3. Corrective steps which have been taken and the results achieved include:

- a. The accounts of this event were described in Plant Safety Meetings. The root cause and contributing causes for the accident were discussed in detail.
- b. Supervisors and Chiefs within the Electrical Department have been instructed to clearly communicate their job scope and clearance requirements to Control Room personnel. Additionally, the need to re-evaluate clearance requirements each time a job scope changes and the need for strict adherence to the requirement for a clearance walkdown prior to the commencement of maintenance activities has been re-emphasized. This was achieved through discussions at shop meetings and by memorandum to Electrical Department personnel.
- c. General Maintenance Electrical (GME) procedures 0-GME-0102.9, "Motor Operated Valve Operator, Inspection and Overhaul (SMB-000)," and 0-GME-0102.10, "Motor Operated Valve Operator, Inspection and Overhaul (SMB-00 and SMB-500)" have been converted from General Maintenance Mechanical (GMM) procedures and approved by the Plant Manager-Nuclear. A Precaution has been added to these procedures which states, "Do not remove stem nut locknut or upper bearing housing if a thrust load is on the actuator or if the valve is under pressure and not fully open, as personnel injury may result. Once the stem nut locknut is removed, stem movement can occur. Stem blocking should be used when removing stem nut locknut and shall be used when it cannot be verified that the pipe is drained and vented." In addition, a Caution has been added which states, "Do not remove locking nut with unit under load or with valve under pressure. Stem blocking should be used and shall be used when it cannot be verified that the pipe is drained and vented."

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

- a. Procedure 0-GMM-0102.8, "Motor Operated Valve Operator, Inspection and Overhaul (SMB-0 through SMB-4)," will be converted to a GME procedure after it has been revised to include Precaution and Caution statements similar to those added to procedures 0-GME-0102.9 and 0-GME-0102.10.
- b. Electrical Department personnel assigned to work on valve actuators will receive training that, as a minimum, will include the following:
 - Methods to render a pressurized valve actuator safe for disassembly.
 - Methods for testing to verify that a valve actuator has been made safe to work.
 - Examples of a generic clearance needed to repair a valve under both pressurized and depressurized conditions.
 - Detailed discussion of Safe Work Practice Rules regarding clearance testing to verify and ensure a proper clearance.

Until this training is completed, Mechanical Maintenance personnel will support Electrical Maintenance personnel during valve actuator



maintenance, as necessary.

5. The date when full compliance will be achieved:

- a. Item 3.a was completed on November 1, 1989.
- b. Item 3.b was completed on October 5, 1989.
- c. Item 3.c was completed on November 9, 1989.
- d. Item 4.a will be complete by February 15, 1990.
- e. Item 4.b will be complete by February 15, 1990.

