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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

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SUBJECT: Responds to violations noted in Insp Repts 50-250/89-45 &  
 50-251/89-45.

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

DECEMBER 20 1989

L-89-456  
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 a Notice of Violation  
Inspection Report 89-45

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

JHG/JRH/rh

Attachment

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

8912270062 891220  
PDR ADOCK 05000250  
Q PDC

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## ATTACHMENT

RE: Turkey Point Units 3 and 4  
Docket Numbers 50-250 and 50-251  
NRC Inspection Report 89-45

### 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 NRC Regulatory Guide 1.33 and Sections 5.1 and 5.3 of ANSI N18.7-1972.

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

- A. O-ADM-031, Independent Verification, dated September 21, 1989, requires independent verification be accomplished using two methods when verifying valve alignments. Valve position indication could be determined using position indicators, stem position, post indication or process parameters such as; flow, pressure, temperature or level indicators.

Contrary to the above, on October 6, 1989, CCW cross-tie valve (4-835H) was found open when the valve was required to be closed under clearance order 4-89-09-137. The operator performing the required independent verification used one method (pulling the chain operator). The operator pulled the chain in the same direction as the first operator; therefore, the valve remained in the incorrect position (open). The operator did not use another independent means of verifying valve position.

- B. AP 0103.4, In Plant Equipment Clearance Orders, dated August 15, 1989, requires clearance tags be installed near drain or vent hoses the Maintenance Department intends to install. Also, when the clearance is released, these hoses shall be removed as appropriate.

Contrary to the above, the inspectors identified five hose connections from valves 3-938B, 3-766B, 4-755A, 4-755B, and 4-RV-200 which were not controlled by an equipment clearance.

### RESPONSE TO EXAMPLE A

1. FPL concurs with the finding.
2. a. The reason for valve 4-835H being in the open position instead of the closed position, as required by clearance 4-89-09-137, is personnel error. Failure to independently verify the position of valve 4-835H by a method different from that used by the individual responsible for

positioning the valve is contrary to administrative procedure O-ADM-031, "Independent Verification."

Valve 4-835H is a chain operated remote manual valve. It is difficult to determine valve position based on stem travel due to the presence of a stem cover. However, the valve stem between the valve and the end of the valve yoke (approximately 12 inches) is visible. Operations personnel should be able to determine valve position based on whether or not the visible valve stem is threaded (valve closed) or smooth (valve open). This valve does not have a position indicator.

- b. FPL received a similar violation in NRC Inspection Report 50-250, 251/88-07 when the 4A Intake Cooling Water heat exchanger inlet isolation valve (4-371) was found to be partially open following removal of a clearance. Valve 4-371 is similar in design to valve 4-835H with the exception that valve 4-371 has a position indicator.

The reason for repetition of the failure to perform an adequate independent verification is ineffective corrective actions taken to prevent recurrence for the previous Notice of Violation. The corrective actions were directed at independently verifying the position of valve 4-371 and did not take into consideration chain operated remote manual valves which do not have position indicators.

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

- a. Valve 4-835H was placed in the "closed" position as required by clearance 4-89-09-137.
- b. The individual responsible for independently verifying the position of valve 4-835H has been counseled on the importance of following procedures and on the procedural requirements for independently verifying valve positions.
- c. An entry has been made in the Operations Department Night Order Book concerning the correct methods of independently verifying the valve position on this type of valve. The entry requires this subject to be discussed at shift briefings and documented in the Plant Supervisor-Nuclear log book.

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

- a. The procedural requirements for performing independent verifications will be re-emphasized during the next requalification training cycle for non-licensed Operations Department personnel. This will be completed by March 7, 1990.
- b. An evaluation will be performed to determine the feasibility of modifying this type of valve to provide a more positive method of independently verifying the valve position. This will be completed by January 31, 1990.



5. The date when full compliance was achieved:
  - a. Item 3.a was completed on October 6, 1989.
  - b. Item 3.b was completed on October 14, 1989.
  - c. Item 3.c was completed on December 13, 1989.

#### RESPONSE TO EXAMPLE B

1. FPL concurs with the finding.
2. The reason for hose connections existing in the field without clearance orders is ineffective corrective actions taken to prevent recurrence for Notice of Violation 50-250, 251/89-012-03. The finding was written against valve 4-201B which was found open, allowing Reactor Coolant System (RCS) water to drain to the containment sump during RCS fill and vent. A commitment was made to review AP 0103.4, "In-Plant Clearance Orders," to ensure its adequacy with respect to drain hose installation as part of the overall evaluation being performed on the clearance order process. A review of other installed hose connections for compliance with existing or proposed procedural administrative controls was not considered.

A requirement to control the installation and removal of vent or drain hoses was added to procedure AP 0103.4 on July 27, 1989 to address Notice of Violation 50,250, 251/89-012-03. The implementation date for this procedure revision was August 27, 1989. FPL believes the five hose connections identified by the NRC inspectors were installed prior to the new procedural requirement to control vent and drain hoses. A review of Plant Work Orders (PWO) did not identify any work performed between August 1, 1989 and December 8, 1989 which would have required installation of a hose connection on the subject valves.

Administrative Procedure 0-ADM-503, "Control and Use of Temporary System Alterations," is the controlling document for temporary connections such as hoses, tubing, or piping which join systems together, bypass a component within a system, or otherwise alter the system's design or configuration. This does not include hoses connected from system drains to floor drains.

3. Corrective steps which have been taken and the results achieved include:
  - a. Valves 3-938B, 3-766B, 4-755A, 4-755B and 4-RV-200 were verified not to have hose connections installed.
  - b. An entry was made in the Operations Night Order Book to remind personnel that hose connections are procedurally controlled.
  - c. The Operations Department is responsible for authorizing the installation of hose connections by clearance order. By Inter-Office Correspondence, Operations Department personnel were made aware of the major changes to AP 0103.4 which became effective on August 27, 1989.





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

- a. Technical Department guidelines for performing system walkdowns have been revised. Hose connections found not to be controlled by a clearance order are to be brought to the attention of the Plant Supervisor-Nuclear (PS-N) by the cognizant System Engineer. This was completed on December 8, 1989.
- b. A walkdown has been performed on the accessible portions of Unit 3 and 4 primary and secondary systems to identify installed hose connections not covered by a clearance order or a Temporary System Alteration (TSA). The identified discrepant conditions will be resolved by removing the hose connection, including the hose connection on a clearance order, or writing a TSA for the hose connection.
- c. An evaluation will be performed to determine the need for additional administrative controls for ensuring the removal of hose connections upon closure of the associated clearance order. This will be completed by December 29, 1989.

5. The date when full compliance will be achieved:

- a. Item 3.a was completed on December 5, 1989.
- b. Item 3.b was completed on November 14, 1989.
- c. Item 3.c was completed on August 7, 1989.
- d. Item 4.b will be completed by December 29, 1989.

