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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  
 LTH.NAME AUTHOR AFFILIATION  
 HARRIS,K.N. Florida Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 900314 ltr re violations noted in Insp Repts  
 50-250/89-53 & 50-251/89-53.Corrective actions:

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L-90-136

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  
NRC Inspection Report 89-053

NRC Inspection Report 50-250, 251/89-053 was issued on March 14, 1990 and provided the results of the Emergency Operating Procedure (EOP) audit conducted at the Turkey Point Nuclear Plant site on January 22 to February 2, 1990. The subject NRC Inspection Report requested that a response be provided by April 13, 1990 clearly defining FPL's plans for corrective action on the inspection findings contained therein. The requested information is provided in the enclosed attachment.

Additionally, a verbal commitment documented in Paragraph 3 of the subject NRC Inspection Report stated that the Shift Technical Advisors (STAs) would be given a key to Document Control and additional training in accessing document control records. During those periods that the plant has entered an Emergency Operating Procedure (EOP), the STA is required to remain in the Control Room to provide Operations support. Therefore, alternate methods of addressing the NRC concern of Document Control access are being evaluated (i.e., use of the Shift Technician).

Should there be any questions on the above or attached information, please contact us.

Very truly yours,

  
K. N. Harris  
Vice President  
Turkey Point Plant Nuclear

KNH/JEC/DRP/DWH/rat

attachment

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

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PDR ADDCK 05000250  
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an FPL Group company

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ATTACHMENT

RE: Turkey Point Units 3 and 4  
Docket Numbers 50-250 and 50-251  
NRC Inspection Report 89-053

ITEM 1

Provide a statement of intended corrective actions, including schedules, for the application of management controls to the maintenance of Emergency Operating Procedures (EOPs) and Off-Normal Operating Procedures (ONOPs).

RESPONSE TO ITEM 1

Intended corrective actions and scheduled completion dates are as follows:

<u>Action</u>	<u>Date</u>
Revise existing administrative procedures and develop new administrative procedures, as necessary, to provide detailed management controls which will:	03/01/91
A. Clearly define interdepartmental duties and responsibilities related to the maintenance of EOPs and ONOPs.	
B. Provide a specific list of documents which make up the Plant Specific Technical Guidelines (PSTGs).	
C. Provide administrative controls necessary to ensure that PSTG documents are updated as procedure changes are made.	
D. Provide special administrative controls for the EOP and ONOP review and approval process. These controls will address the need for verification, validation and engineering evaluation; as well as training requirements associated with each EOP and ONOP change.	
E. Eliminate conflicting guidance pertaining to EOP and ONOP development, revision, verification, validation, periodic review, and approval.	



## ITEM 2

Provide intended corrective actions, including schedules, for the revision of ONOPs for cavity seal failure.

### RESPONSE TO ITEM 2

Intended corrective actions and scheduled completion dates are as follows:

<u>Action</u>	<u>Date</u>
An engineering analysis will be performed to support the event mitigation strategy for refueling cavity seal failure. The results of this engineering analysis will be used to revise or replace procedures 3/4-ONOP-033.2, "Refueling Cavity Seal Failure." The discrepant conditions noted in Section V.23 of Appendix B to the subject NRC Inspection Report will be resolved during the procedure upgrade. The above actions will be completed by the scheduled completion date.	11/30/90

## ITEM 3

Provide intended corrective actions, including schedules, for the revision of ONOPs for intake cooling water malfunctions.

### RESPONSE TO ITEM 3

Intended corrective actions and scheduled completion dates are as follows:

<u>Action</u>	<u>Date</u>
Develop one new ONOP to address intake cooling water failure scenarios currently addressed in ONOP 3408.1, "Intake Cooling Water - Malfunction," and ONOP 3408.2, "Intake Cooling Water - Failure of System," then cancel ONOP 3408.1 and ONOP 3408.2. The discrepant conditions noted in Sections V.50 and V.51 of Appendix B to the subject NRC Inspection Report will be resolved during the procedure upgrade. The above actions will be completed by the scheduled completion date.	11/30/90

## ITEM 4

Provide the date by which the review and corrective action will be complete for the findings identified in the subject NRC Inspection Report.

### RESPONSE TO ITEM 4

Intended corrective actions and the scheduled completion dates are as follows:

<u>Action</u>	<u>Date</u>
<p>IFI 53-01: Lack of restrictions on EOP entry points.</p> <p>This finding will be addressed during development of the detailed management controls outlined in Item 1 above.</p>	03/01/91
<p>IFI 53-02: Three particularly weak ONOPs and overall weakness in ONOPs.</p>	
<p>The ONOPs for refueling cavity seal failure will be upgraded as outlined in Item 2 above.</p>	11/30/90
<p>The ONOPs for intake cooling water malfunctions will be upgraded as outlined in Item 3 above.</p>	11/30/90
<p>ONOP 0208.15, "Annunciator - General," will be revised or replaced to resolve the discrepant conditions noted in Section V.42 of Appendix B to the subject NRC Inspection Report.</p>	11/30/90
<p>The overall weaknesses in ONOPs will be addressed through actions taken to resolve IFI 53-05, IFI 53-06, and IFI 53-07. The completion date is an estimated date which is subject to change.</p>	12/31/92
<p>IFI 53-03: Weakness in EOP placekeeping.</p>	
<p>This finding will be addressed during development of the detailed management controls outlined in Item 1 above.</p>	03/01/91
<p>IFI 53-04: EOP V&amp;V open items from PGP SER.</p>	
<p>This item will be addressed during development of the detailed management controls outlined in Item 1 above.</p>	03/01/91
<p>IFI 53-05: EOP technical and human factors deficiencies.</p>	
<p>The discrepant conditions identified against EOPs in Appendix B to the subject NRC Inspection Report will be resolved. The completion date is an estimated date which is subject to change.</p>	11/01/91
<p>The discrepant conditions identified against ONOPs in Appendix B to the subject NRC Inspection report will be resolved as part of an ongoing procedure upgrade milestone. Up-</p>	12/31/92





grade priority will address ONOPs referenced by EOPs first. The remaining ONOPs will be addressed as determined by plant need. The completion date is an estimated date which is subject to change.

IFI 53-06: EOP writer's guide deficiencies.

The discrepant conditions identified against EOPs in Appendix C to the subject NRC Inspection Report will be resolved. The completion date is an estimated date which is subject to change. 11/01/91

The discrepant conditions identified against ONOPs in Appendix C to the subject NRC Inspection Report will be resolved as part of an ongoing procedure upgrade milestone. Upgrade priority will address ONOPs referenced by EOPs first. The remaining ONOPs will be addressed as determined by plant need. The completion date is an estimated date which is subject to change. 12/31/92

The discrepant conditions identified against the EOP Writer's Guide and the ONOP Writer's Guide in Appendix C to the subject NRC Inspection Report will be addressed during development of the detailed management controls outlined in Item 1 above. 03/01/91

IFI 53-07: EOP nomenclature and labeling deficiencies.

The discrepant conditions identified against EOPs in Appendix D to the subject NRC Inspection Report will be resolved. The completion date is an estimated date which is subject to change. 11/01/91

The discrepant conditions identified against ONOPs in Appendix D to the subject NRC Inspection Report will be resolved as part of an ongoing procedure upgrade milestone. Upgrade priority will address ONOPs referenced by EOPs first. The remaining ONOPs will be addressed as determined by plant need. The completion date is an estimated date which is subject to change. 12/31/92

IFI 53-08: Management control of ONOPs and EOPs.

This finding is addressed in Item 1 above. 03/01/91