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SUBJECT: Responds to violations noted in Insp Repts 50-250/90-09 &
50-251/90-09.

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JUNE 27 1990

L-90-231
10 CFR 2.201

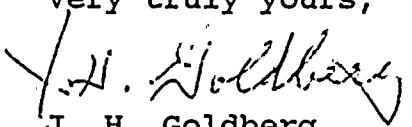
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Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Reply to Notice of Violation
NRC Inspection Report 90-09

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

Very truly yours,


J. H. Goldberg
President
Nuclear Division

JHG/GRM/sh

Attachment

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

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ATTACHMENT

REPLY TO A NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4
Docket Number 50-250 and 50-251
NRC Inspection Report 90-09

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 of ANSI N18.7-1972.

A. Administrative Procedure 0-ADM-715, Maintenance Procedure Usage, dated June 25, 1989, section 5.2.2 provides specific instructions to allow entry into a maintenance procedure at any step, which includes the following:

1. All precautions and limitations have been read and understood and prerequisites have been met by the Maintenance personnel performing the task; and
2. The entry or exit point is designated on the PWO or another procedure; or
3. Troubleshooting is in progress and the job supervisor has designated an entry point via a troubleshooting procedure; or
4. Procedure directs entry point for a specific task.

Contrary to the above, on April 6, 1990, a technician removed power supply fuses, to allow installation of a new module, in the Control Room Ventilation Radiation Monitor without following the requirements of 0-ADM-715. Because the precautions/limitations associated with temporary procedure TP-584, Control Room HVAC Monitor RAI 6642 and RAI 6643 Channel Calibration, were not implemented, an automatic shift of the Control Room Ventilation System to the Recirculation Mode occurred.

B. Administrative Procedure 0103.4, In-plant Equipment Clearance Orders, specifies the required instructions to obtain, issue and release clearances to ensure safety and protection of plant personnel and equipment.

Contrary to the above, on March 24, 1990, as a result of an inadequate partial release of clearance 3-90-01-155-R for valve repacking and stroke testing, valve LCV-3-115B, RWST to Charging Pump Header, was cycled to the open position allowing approximately 2000 gallons of water from the RWST to be released to the auxiliary building through the 3A charging pump which was disassembled for maintenance.

RESPONSE TO EXAMPLE A

1. FPL concurs with the finding.
2. The cause of this event was the plant I&C specialist failing to comply with plant procedure 0-ADM-715, "Maintenance Procedure Usage," step 5.1.1 which requires maintenance procedures be followed in a step by step manner. Procedure TP-584, "Control Room HVAC Monitor RAI 6642 and RAI 6643 Channel Calibration", was being performed to calibrate control room HVAC radiation monitor RAI 6642. Two days earlier the procedure had been started and stopped when module RP-1A was found to be defective. A new replacement module was ordered. After arrival, the procedure was resumed at step 6.3.1. This resulted in step 6.1.3.1, which disables channel RAI 6642, being bypassed. Step 6.3.1 of the procedure required the specialist to remove the existing module after de-energizing its power supply by removing two fuses. As soon as the fuses were removed the control room ventilation system shifted into the recirculation mode. Had step 6.1.3.1 been performed prior to step 6.3.1. this incident would have been prevented.
3. Corrective actions which have been taken and the results achieved:

Please note that the following corrective actions were taken and achieved in LER 250-90-006-00 submitted on May 7, 1990 under FPL letter number L-90-169.

- a. The I&C specialist was counselled on the importance of stopping a procedure when steps conflict with the as found condition of the plant or equipment.
 - b. Procedure use guidelines were reviewed during the I&C department shop meeting to stress the importance of stopping a procedure when steps conflict with the as found condition of the plant.
4. Corrective actions which will be taken to avoid further violations include:

No future corrective actions are necessary.



5. The date when full compliance will be achieved:

Full compliance has been achieved.

RESPONSE TO EXAMPLE B

1. FPL concurs with the finding.
2. The cause of this event was failure of plant personnel to adequately track work being performed under the required clearances. This resulted in both clearances being partially released with the 3A charging pump still disassembled. The plant work order used to overhaul the pump was still open when this occurred.

A contributing factor for this event was the reactor control operator not updating the EOOS log to reflect the transfer of the 3A charging pump work from clearance 3-90-01-155-R to clearance 3-90-01-197-R. Maintenance personnel also were not aware of all the procedural requirements in procedure AP-103.4, "In-Plant Equipment Clearance Orders," which provide instructions for issuance, use, control and release of clearances.

3. Corrective steps which have been taken and the results achieved:
- a. The personnel involved with the clearance tracking problem and improper clearance release were counselled and disciplined.
 - b. A training brief was issued to the Maintenance Department to stress the importance of knowing the status of all PWO's being worked prior to clearance release. Emphasis will be placed on ensuring that work is tracked as required by AP-103.4.

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

Procedure AP-103.4 is being rewritten and a new procedure for control of equipment out of service is being originated.

5. The date when full compliance will be achieved:

Item 4 will be completed by October 31, 1990.