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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 50-250/90-14 & 50-251/90-14.

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

JULY 20 1990

L-90-269
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
NRC Inspection Report 90-14

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
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 NOTICES OF VIOLATION

RE: Turkey Point Units 3 and 4
Docket Numbers 50-250 and 50-251
NRC Inspection Report 90-014

FINDING A

TS Table 3.5-5, Item 15, and Action Statement 9, require at least one of two channels of RVLMS be operable or entry into the Limiting Condition for Operation (LCO) is required. Action Statement 9 requires that at least one channel of RVLMS be restored within 48 hours. If this cannot be done without shutting down the reactor, an alternate method for monitoring reactor vessel inventory must be provided. In addition, TS 3.0.4 prevents entry into an operational mode or other specified condition unless the conditions for the LCO are met without reliance on provisions contained in the action statement.

Contrary to the above, on May 21, 1990, the licensee identified that the LCO associated with TS Table 3.5-5, Action Statement 9, was exceeded on May 19, at 5:51 p.m., as both channels of RVLMS on Unit 3 were out of service on an equipment clearance order and provisions were not made for alternate reactor vessel inventory monitoring. This condition had existed since May 17, 1990, at 5:51 p.m. In addition, the unit changed modes and entered Mode 3 on May 18, 1990, at 7:15 p.m., with the clearance still in effect.

RESPONSE TO FINDING A

1. FPL concurs with the finding.
2. The cause for both channels of RVLMS being inoperable while Unit 3 entered Mode 3 was personnel error. A licensed operator failed to perform a comprehensive review of the clearance order book to determine if any equipment required for entry into Mode 3 was out of service. The clearance order book index was reviewed but had not been updated to include clearance order 3-90-05-110-R.

The following factors contributed to this event:

- Operating Surveillance Procedure 0-OSP-200.2, "Plant Startup Surveillances," requires procedure 3-OSP-204, "Accident Monitoring Instrumentation Channel Checks," to be performed prior to entering Mode 4. Procedure 3-OSP-204 did not contain acceptance criteria for a normal expected temperature difference between heated and unheated junction thermocouples. Operations personnel

did not question both sets of thermocouples indicating approximately the same temperature. The system passed the channel check with no power to the heated junction thermocouples.

- Although the heated junction thermocouples were logged in the Equipment Out Of Service (EOOS) Book, clearance order 3-90-05-110-R was not entered under the comment section for the entry when transcribed from hand-written to computerized format by the Reactor Control Operator (RCO). This led to confusion about the entry.

This event was reported to the NRC in Licensee Event Report 50-250/90-10.

3. Corrective steps which have been taken and the results achieved include:
 - a. Upon discovery that the heated junction thermocouple power supply breakers were open, the breakers were closed. This returned the Reactor Vessel Level Monitoring System (RVLMS) to an operable status.
 - b. Briefings were held to explain the RVLMS system theory to operations control room personnel.
4. Corrective steps which will be taken to avoid further violations include:
 - a. General Operating Procedures 3/4-GOP-301, "Hot Standby to Power Operation," and 3/4-GOP-503, "Cold Shutdown to Hot Standby," have been revised requiring the Plant Supervisor-Nuclear (PSN) to verify that the clearance order book has been reviewed prior to making a mode change.
 - b. On-The-Spot-Changes (OTSCs) have been generated against procedure 3/4-OSP-204 to add a minimum acceptable temperature difference between the heated and unheated junction thermocouples.
 - c. An entry has been made in the Operations Night Order Book requiring the Assistant Plant Supervisors-Nuclear (APSNs)/PSNs to review and initial the computerized EOOS log entries to ensure that pertinent information contained on the hand-written log entries has been correctly transcribed.

5. The data when full compliance was achieved:
 - a. Item 3.a was completed on May 21, 1990.
 - b. Item 3.b was completed on May 29, 1990.
 - c. Item 4.a was completed on June 15, 1990.
 - d. Item 4.b was completed on June 27, 1990.
 - e. Item 4.c was completed on June 18, 1990.

FINDING B

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 Section 5.1 of ANSI N18.7-1972. Section 5.1.2 of ANSI N18.7-1972 requires that procedures be followed.

O-ADM-021, Technical Specification Implementation Procedure, revision dated April 12, 1990, specifies that the requirements of this procedure (interim TS) are to be compiled with unless the procedure (interim TS) requirements are: waived in accordance with the procedure or are less restrictive than the current TS. O-ADM-021, Section 3/4.5.2 requires that one operable flow path from the Refueling Water Storage Tank to the RCS via the SI pumps be operable with RCS temperature greater than 380 F.

Contrary to the above, on May 18, 1990, O-ADM-021 was not followed in that the operators heated the Unit 3 RCS above 380° F (410° F) with SI flowpath isolation valves (3-867A and B) locked closed. This rendered the SI flowpath inoperable. The requirement to have an operable SI flowpath above 380° F was more restrictive than current TS; however, the licensee did not obtain a waiver.

RESPONSE TO FINDING B

1. FPL concurs with the finding.
2. The cause of allowing SI flowpath isolation valves 3-867A and 3-867B to remain locked closed while Unit 3 exceeded 380° F was personnel error. The following factors contributed to this condition:
 - Administrative Procedure (AP) 0103.4, "In-Plant Equipment Clearance Orders," requires components within the clearance boundary to be aligned or verified to be aligned for the required mode of system operation in accordance with the applicable plant procedure. This



alignment is to be completed during the release of the clearance to return a system or component to service. The normal position for valves 3-867A and 3-867B is locked open, as specified in Operating Procedure 3-OP-062, "Safety Injection." The individual preparing the clearance release for valves 3-867A and 3-867B did not consult 3-OP-062, as required by AP 0103.4.

- As specified in procedure AP 0103.4, the Nuclear Watch Engineer (NWE), Assistant Plant Supervisor-Nuclear (APSN) or Plant Supervisor-Nuclear (PSN) is responsible for ensuring the clearance order, partial release and release forms are properly filled out by the Foreman/Supervisor holding the clearance. For clearance 3-90-04-162-R, the individual initiating the clearance release was the same individual authorizing the clearance release. A mistake made in specifying a release position of locked closed for valves 3-867A and 3-867B was not subjected to an independent review, as required by AP 0103.4.
3. Corrective steps which have been taken and the results achieved include:
- Upon discovery that valves 3-867A and 3-867B were in the locked closed position, they were immediately placed in the locked open position.
4. Corrective steps which will be taken to avoid further violations include:
- a. This event has been presented to operations personnel in the weekly shift meetings with management personnel. Adherence to the requirements and intent of AP 0103.4 were emphasized.
 - b. Procedure AP 0103.4 is currently being revised as a procedure upgrade effort and will be re-issued as Administrative Procedure O-ADM-212, "In-Plant Equipment Clearance Orders." Changes will be incorporated to clarify the requirement to independently verify positions specified for system components on a clearance release.
5. The date when full compliance was achieved:
- a. Item 3 was completed on May 18, 1990.
 - b. Item 4.a was completed on July 3, 1990.
 - c. Item 4.b will be completed by October 31, 1990.