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 ACIL: 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 50-250/90-30 &
 50-251/90-30 re changes to master calibr sheet.

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FPL

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

OCTOBER 16 1990

L-90-362
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 90-30

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/SAV/lef

Attachment

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

9010260109 901014
PDR ADOCK 05000250
Q PDC



ATTACHMENT

REPLY TO A NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4
Docket Number 50-250 and 50-251
NRC Inspection Report 90-030

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. Section 5.1 of ANSI N18.7-1972 requires that administrative policies be provided to control the issuance of documents, including changes, that prescribe activities affecting safety-related structures, systems, or components.

Contrary to the above, administrative policies were not established to control changes to the master instrument calibration data sheet for Unit 4 CCW pump automatic start pressure switch, PC-4-611, in that procedures did not address changes to the instrument calibration data sheets. In January, 1988, the required and actual setpoints for PC-3-611 and PC-4-611 were changed from 75.0 + 1.5 psig to 60.0 + 1.5 psig but the related instrument calibration data sheets were not changed. Subsequently, PC-4-611 was moved and then improperly calibrated to 75.0 + 1.5 psig using the instrument calibration data sheets. As a result, on July 26, 1990, the Unit 4A CCW pump improperly automatically started due to pressure switch PC-4-611 being set at the wrong value.

RESPONSE TO THE FINDING

1. FPL concurs with the finding.
2. Instrument calibration data sheets were developed to augment Plant Work Orders (PWOs) for those instruments under the control of I & C Maintenance. Instrument calibration data sheets specify a setpoint and require that the as-found and as-left setpoint be documented. During initial development, setpoints contained in design documents were incorporated into the instrument calibration data sheets.

Although not proceduralized, a policy had been developed for revising instrument calibration data sheets. An individual within I & C Maintenance was assigned the responsibility for revising instrument calibration data sheets and for ensuring the affected instrument(s) is calibrated to the new setpoint.



When the setpoint for PC-*-611 was changed to 60.0 +/- 1.5 psig, this individual failed to revise the affected instrument calibration data sheet. Additionally, the instrument calibration data sheet was not attached to the Plant Work Orders (PWOs) used to change the setpoint of PC-3-611 and PC-4-611 to 60.0 +/- 1.5 psig. Only the setpoint change document was attached to the PWOs.

The written violation stated that the 4A CCW pump improperly automatically started due to pressure switch PC-4-611 being set at the wrong value. FPL would like to clarify that automatic starting of a CCW pump upon CCW pump discharge header pressure reaching the low pressure setpoint is a proper system reaction.

This violation and the following corrective steps, with the exception of Corrective Step 3.c, were discussed in Licensee Event Report 50-251/90-007.

3. Corrective steps which have been taken and the results achieved include:
 - a. The instrument calibration data sheet for PC-3-611 and PC-4-611 was revised to specify a low pressure setpoint of 60.0 psig +/- 1.5 psig.
 - b. PC-3-611 and PC-4-611 were calibrated to 60.0 psig +/- 1.5 psig.
 - c. This event was discussed during an I & C Maintenance shop meeting.
4. Corrective steps which have been taken to avoid further violations include:
 - a. Maintenance Instruction 102.114, "Maintenance Instruction On The Spot Change (MICHANGE) Preparation, Review and Approval Form," has been revised to include provisions for changing instrument calibration data sheets based on information contained in a Plant Change/Modification (PC/M).
 - b. I & C Maintenance instrument setpoint changes which were made through Administrative Procedure 0140.2, "Precautions, Limitations, and Setpoint Changes," and issued PC/Ms were verified. No discrepancies were found.
 - c. Administrative Procedure O-ADM-701, "Plant Work Order Preparation," has been revised to require instrument calibration data sheets to be verified and attached to PWOs that involve instrument calibrations or calibration checks.



5. The date when full compliance was achieved:

- a. Item 3.a was completed on July 27, 1990.
- b. Item 3.b was completed on July 27, 1990.
- c. Item 3.c was completed on August 3, 1990.
- d. Item 4.a was completed on August 2, 1990.
- e. Item 4.b was completed on September 28, 1990.
- f. Item 4.c was completed on August 9, 1990.

