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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 ltr re violations noted in insp repts 50-250/91-38 & 50-251/91-38.Corrective actions:off normal operating procedure ONOP-030 revised 910912 to incorporate monitoring requirements.

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

NOV 1 3 1991

L-91-312
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 No. 50-250 and 50-251
Reply to Notice of Violation
NRC Inspection Report 91-38

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

If there are any questions please contact us.

Very truly yours,

J. H. Goldberg
President
Nuclear Division

JHG/DPS/ds

Attachment

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

IE01
1/1

ATTACHMENT

REPLY TO A NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
NRC Inspection Report 91-38

FINDING

"10 CFR 50, Appendix B, Criterion III, Design Control, as implemented by Florida Power and Light Company procedure QI 3-PTN-1, "Design Control", requires that design control measures shall provide for verifying or checking the adequacy of design, such as by performance of design reviews, use of alternate or simplified calculational methods, or by performance of a suitable testing program.

Contrary to the above, Plant Change/Modification 91-064, charging pump service water hose connections, was developed under the Minor Engineering Package program. The design package did not provide adequate calculation, analysis, testing or procedural guidance to demonstrate that service water could supply adequate cooling for the charging pumps' hydraulic oil which was the design intent of the modification. Consequently, the design change did not receive adequate design review to identify design deficiencies and post modification testing failed to verify the adequacy of the design.

This is a Severity Level IV violation (Supplement 1)."

RESPONSE TO FINDING

1. FPL concurs with the finding.

2. This event was caused by cognitive personnel errors by non-licensed plant personnel.

   a. During preparation of the Minor Engineering Package (MEP), vendor information could not be obtained for the hydraulic coupling heat load such that proper fluid flow rate sizing could accurately be calculated. As a result, the MEP was issued based on an informal service water flow test and heat exchanger capabilities developed from vendor heat transfer calculations for various cooling water flows. This information provided reasonable assurance that the design was adequate. However, the MEP further required monitoring of the oil temperature and the starting of alternative charging

pumps if oil temperature became excessive (greater than 180 degrees Fahrenheit) on the pump in operation. This information was not incorporated in the off normal operating procedure (ONOP) for this system alignment.

b. The MEP did not contain sufficient documentation, ie.. analysis, evaluations, or calculations to justify the modification.

c. No post modification testing was specified to verify the adequacy of the design.

d. The design review failed to identify the noted weaknesses of the design package. The design review was inadequate.

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

a. Off Normal Operating Procedure (ONOP) ONOP-030 was revised on September 12, 1991, to incorporate the monitoring requirements and required actions from the revised MEP.

b. The specific individuals involved with the preparation of the MEP were counseled on better documentation of design basis and analysis as well as procedure adherence. This was completed by September 24, 1991.

The personnel responsible for the inadequate ONOP were admonished with the plant personnel receiving written reprimands and the contract worker's contract being terminated on September 27, 1991 as a result of this event.

c. Quality Instruction Change Notice (QICN) 36 to procedure QI 3.14, "Minor Engineering Packages (MEPs)" was issued on September 24, 1991, to clarify QI 3.14 as follows:

i. To require thorough and clear documentation of the assessment and include evaluations of all applicable design and safety considerations.

ii. The change notice states that the design analysis required to support the modification shall be included or referenced.

iii. QI 3.14 now requires that the engineering justification provide sufficient detail to

demonstrate that the modification complies with all applicable design requirements.

iv. Post-modification testing shall be clearly specified as required. Specifically, any post-modification testing required by the design engineer or equipment vendor, which is not part of the routine plant startup or maintenance testing procedures, shall be clearly specified.

v. All MEPs which involve physical modification or implementation shall receive a joint pre-implementation walkdown including participation by Engineering, the System Engineer, Maintenance, and Operations (as-applicable). The completion of the walkdown shall be documented by the signatures of all participants.

d. A technical evaluation completed on November 1, 1991, on the design process for MEP 91-064, "Backup Cooling Water System" verified that the design was adequate.

e. Site Engineering performed a review of all MEP's issued since the inception of the MEP process (March, 1991, for Turkey Point) and the MEP's in the development process at Turkey Point to verify the adequacy of the MEP as a valid design document. An independent review was also performed by Florida Power and Light's Corporate Engineering Technical Staff. These reviews concluded that the MEP process was sound. These reviews were completed by October 31, 1991.

f. To insure an adequate design review, a policy letter was issued on September 24, 1991, requiring Engineering Manager approval of all MEP's.

g. In addition, to help insure an adequate design review, the Plant Nuclear Safety Committee (PNSC) members have been retrained (sensitized) concerning the level of review necessary for design change Post Modification Testing. This was completed by September 24, 1991.

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

a. The above corrective actions are deemed to be sufficient to preclude recurrence.

5. The date full compliance will be achieved:
Full compliance was achieved on November 1, 1991.