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SUBJECT: Responds to violations noted in Insp Repts 50-250/91-37 &
50-251/91-37. Corrective actions: plant change/mod installed
in current cavity seal ring holddown clamps & procedure re
removal of reactor cavity seal ring revised.

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

NOV 22 1991

L-91-318
10 CFR 2.201

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Unit 3 and Unit 4
Docket Nos. 50-250 and 50-251
Reply to Notice of Violation
NRC Inspection Report 91-37

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

Very truly yours,

J. H. Goldberg
President
Nuclear Division

TFP/CLM/cm

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 91-37

FINDING

Technical Specification (TS) 6.8.1 requires written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, and Sections 5.1 and 5.3 of ANSI N18.7 - 1972. Section 5.1.2 of ANSI N18.7 - 1972 requires that procedures be followed.

0-GME-043.6, Reactor Vessel Cavity Seal Ring Installation, step 6.4.7, requires the installation of the 24 compression arms in their proper location. Step 6.4.7.1 states to ensure that the beveled end of the compression arm is resting on the seal ring.

Contrary to the above, on December 22, 1990, 2 of the 24 compression arms were not installed in their proper position on the seal ring. In addition, this deficient condition existed for an eight-month period.

RESPONSE TO FINDING

1. FPL concurs with the finding, with the following clarification: the correct procedure number is 0-GMM-043.6.
2. Plant Change/Modification (PC/M) 86-014 installed the current cavity seal ring hold down clamps. During the initial installation by Construction in 1987, Nonconformance Report (NCR) C-0241-87 was issued to document misalignment between five compression blocks and compression arms. The NCR disposition required installation of temporary blocks at four locations and "accept as is" at one location. Corrective action also required that the appropriate procedure contain a hold point to verify removal of the temporary blocks following refueling. However, installation and removal of the temporary blocks were documented as part of the NCR.

3

Prior to the next refueling in 1990, Discrepant Field Condition DFC 90-0025 was initiated by Construction to address the same misalignments. An evaluation was performed by Engineering (JPN-PTN-SEMS-90-031, NCR N-90-0049) which required each misaligned block to be inspected, and an attempt made to provide "full line of contact" between each compression block and compression arm. Where full contact could not be made, temporary blocks were to be installed. The NCR required a procedure revision to verify removal of the temporary blocks. Process Sheet 90-081 was revised. Work was performed by Construction.

The first time Mechanical Maintenance installed the cavity seal rings was at the beginning of the Dual Unit Outage just completed. Mechanical Maintenance installed the seal rings in accordance with procedure 0-GMM-043.6, Reactor Cavity Seal Ring Installation. Step 6.4.7.1 stated, "Ensure beveled end of compression arm is resting on the seal ring." No drawing was included in the procedure to indicate the proper configuration of the seal ring hold down clamp design, showing the compression arm resting on the compression block. The procedure did not specify the requirement to have the compression arms in full contact with the compression blocks, nor did it allow the use of temporary blocks. The seal rings were installed with each compression arm resting on a compression block or on the seal ring plate.

Cause of Event:

The immediate cause of the event was an inadequate procedure, in that the procedure did not sufficiently specify the arm/block alignment requirements. The cause of the inadequate procedure was inadequate incorporation of PC/M design information as evaluated and modified in the two previous NCRs, and in safety evaluation JPN-PTN-SEMS-90-031. A major contributing factor was that two separate Quality Control (QC) organizations existed, with different applications of the term "procedure." Plant QC typically considered only Maintenance Procedures as work documents, while Construction QC normally restricted their view of procedures to Process Sheets. An additional contributing factor was that the NCRs and the safety evaluation did not clearly identify corrective actions.

The NCRs and the safety evaluation justified the use of the temporary compression blocks to obtain a full line of contact with the compression arms. The safety evaluation authorized the future use of the temporary compression blocks, provided the requirements of the disposition of NCR N-90-0049 were followed. One of those requirements was that, "the procedure shall be revised to contain a hold point which verifies the removal of any temporary compression blocks..." Since the NCR had been generated by Construction, only the Construction Process Sheet was revised. The plant Maintenance Procedure was not specifically addressed.

When installed by Maintenance, any misalignment of the clamps was considered not to be a problem since each compression arm was in contact with the seal ring plate or compression block (both are parts of the seal ring), and post-maintenance testing was satisfactory. It was also apparent that the misalignment was a result of the original installation, and assumed to be acceptable. Maintenance personnel were not aware of past NCRs addressing misalignment.

3. Corrective steps which have been taken and the results achieved:
 - a. Procedure 0-GMM-043.6 has been revised to provide directions for the installation of temporary blocks where "full line of contact" is not achieved between the compression arm and block, and to include a sketch showing proper compression arm/block contact.
 - b. Procedure 0-GMM-043.3, Removal of Reactor Cavity Seal Ring, has been revised to include verification by a Quality Control Inspector that any temporary blocks have been removed.
 - c. The compression arms and blocks on the Unit 4 reactor cavity seal ring were inspected for "full contact." All compression arms were found to be in full contact with the compression blocks.
 - d. Engineering performed a walkdown and an evaluation of the existing condition, and determined the condition to be acceptable for the reasons listed in the body of the inspection report (Ref: NCR N-91-0803).
 - e. The guidelines for dispositioning NCRs, found in JPN-QI 15.1-3, have been upgraded. Completion of JPN Form #65 identifies the Final Engineering Output Documents required to close the NCR. In this particular case, the earlier NCR dispositions would have been classified either as "Use Alternate Design," or as "Use As Is," and one of five possible output documents would have been required.
 - f. Prior to the recently completed dual unit outage, three separate NCR systems existed; one for Construction, one for Procurement, and one for the plant. As a result, "Construction" NCRs typically received Construction-oriented dispositions. The three systems have now been combined, as have the QC organizations. All NCR dispositions are now reviewed by the same QC organization.
 - g. All engineering safety evaluations are required to specify all required actions in a dedicated section of the evaluation. The evaluation format containing the "Actions Required" section existed in 1989, but its use was made mandatory in March of 1991.

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

a. Engineering will issue a PC/M to update design documents to allow continued use of the moveable compression blocks.

5. The date when full compliance was achieved:

Full compliance was achieved on August 30, 1991, when the Unit 3 reactor cavity seal ring was removed in accordance with procedure 0-GMM-043.3, Removal of Reactor Cavity Seal Ring. In addition, corrective actions were or will be completed as follows:

- a. Item 3.a above was completed when the procedure revision was approved by the Plant Nuclear Safety Committee, and signed by the Plant Manager - Nuclear on September 3, 1991.
- b. Item 3.b above was completed when the procedure revision was approved by the Plant Nuclear Safety Committee, and signed by the Plant Manager - Nuclear on September 24, 1991.
- c. Item 3.c above was completed on September 23, 1991.
- d. NCR N-91-0803 was closed (Item 3.d), on September 23, 1991.
- e. JPN-QI 15.1-3 was revised in August, 1990 (after NCR N-90-0049 had been closed).
- f. The three NCR systems were integrated on October 19, 1990. (Ref: QCQI 15.1)
- g. JPN-QI 3:9, mandating the dedicated section for action required, on safety evaluations, was revised in March, 1991.
- h. The PC/M described in Item 4.a above will be issued by March 31, 1992.

