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ACCESSION NBR: 9112270111 DOC. DATE: 91/12/19 NOTARIZED: NO DOCKET #
 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

AUTH. NAME: GOLDBERG, J.H.
 AUTH. AFFILIATION: Florida Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION

Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Repts 50-250/91-35 & 50-251/91-35. Corrective actions: cited document packages updated to reflect installed configuration & package will be revised to include vendor model number changes.

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 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

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NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 22 ENCL 22





FPL

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

DEC 19 1991

L-91-322
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 a Notice of Violation
NRC Inspection Report 91-35

Florida Power and Light Company has reviewed the subject inspection report and pursuant to 10 CFR 2.201, the required response is attached. In response to a telephone conversation between Turkey Point and NRC Region II, the required submittal date for this reply was extended to December 20, 1991. This extension was a result of a delay in FPL receiving the inspection report.

If there are any questions please contact us.

Very truly yours,

J. H. Goldberg
President
Nuclear Division

JHG/RJT/rt

Attachment

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

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FDR ADOCK 00000200
Q FDR

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ATTACHMENT

REPLY TO A NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
NRC Inspection Report 91-35

FINDING

"10 CFR 49(d) requires in part that the licensee shall prepare a list of electric equipment important to safety covered by this section. In addition, the licensee shall include information in paragraph 10 CFR 50.49(d)(1); (2); and (3) for this electric equipment important to safety in a qualification file. The licensee shall keep the list and information in the file current and retain the file in an auditable form for the entire period during which the covered item is installed in the nuclear plant or is stored for future use to permit verification that each item of electric equipment important to safety meets the qualification requirements of 10 CFR 50.49(j).

Contrary to the above, eight Documentation Packages were found to be not current during an inspection conducted August 26-30, 1991, in that Plant Change Modification Packages were not closed out in a timely manner to facilitate revision of the Documentation Packages. Additionally, design controls inadequacies, such as failure to implement the requirements of Plant Change Modification 81-157, Change Notice No. 12, has resulted in EQ documentation inaccuracies since at least August 1989, in that EQ qualification requirements for RTDS are shown to be simultaneously satisfied by different Documentation Packages.

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

RESPONSE TO FINDING

1. Florida Power and Light (FPL) concurs with the finding.
2. The event was caused by an programmatic weakness in the Environmental Qualification documentation revision process, as described below:
 - a. The Environmental Qualification (EQ) Documentation Packages were given a low priority, such that higher priority jobs were continuously delaying their completion.
 - b. The Environmental Qualification Documentation Packages were inconsistently handled in the Plant Change/Modification (PC/M) process.



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

Revisions to the EQ Documentation Packages, which are updated via the PC/M process, are controlled by the Document Control Tracking System (DCTS) which identifies all affected drawings. Since EQ documentation is maintained as drawings (i.e., EQ Documentation Packages), inclusion into the DCTS provides an effective method for ensuring that the applicable documentation packages are updated.

The following list of corrective actions were provided to the NRC in Florida Power & Light Letter number L-91-246, dated September 30, 1991.

- a. The eight Documentation Packages cited in the Inspection Report were updated to reflect the installed configuration by December 17, 1991. Additional EQ Documentation Packages will be updated to reflect the installed configuration of all known periodic update items by December 31, 1991.
 - b. All outstanding approved design changes which have been implemented and accepted by the plant prior to November 1, 1991, will have the EQ Documentation Packages updated to reflect the installed configuration by December 31, 1991.
 - c. The EQ Documentation Packages will be revised by December 31, 1991, to include an explanation of the vendor model number change for Limitorque Motor Operated Valves MOV-3-1404 and MOV-4-1404, Steam Stop Valves to Auxiliary Feedwater Pumps.
 - d. EQ list information is available in the Total Equipment Data Base, within 30 days following plant acceptance of the completed modification.
4. Corrective actions which will be taken to avoid further violations include (also discussed in L-91-246):

Following completion of the Safety Related Drawing Update Program (presently scheduled for March 31, 1992), EQ Documentation Packages will receive a higher priority than had been required in the past. The new priority will require that EQ Documentation Packages be revised to reflect the installed configuration within 60 days of plant acceptance of a completed modification.

Reply to NOV 91-35
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5. The date full compliance will be achieved:

Full compliance will be achieved by December 31, 1991.