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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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 GOLDBERGJ.H. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION

Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC ltr re violations noted in insp insp repts
 50-250/92-24 & 50-251/92-24. Corrective actions: licensee
 procedure will be written for installation of RTDs that will
 include data transmittal for updating protection parameters.

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NOTES: NRR RAGHAVAN, L 05000250
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FPL

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

DEC 21 1992

L-92-339
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 92-24

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/OIH/oh

Attachment

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

240021
9212280093 921221
PDR ADDCK 05000250
G PDR
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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 92-24

FINDING:

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Section 9 of Appendix A of Regulatory Guide 1.33 recommends procedures for performing maintenance.

Administrative Procedure 0190.19, Control of Maintenance and Construction Work on Safety Related and Quality Related Systems, paragraph 3.2.1, states that work activities which can affect the performance of safety related and quality related equipment shall be appropriately preplanned and shall be performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

Procedure O-GMI-102.26, Alteration of Eagle 21 Protection System Parameters, Section 6.6, Protection Set III Parameter Update, on page 38, requires that the field supervisor verify that the correct parameters were updated and the correct values for parameters were entered.

Contrary to the above, on September 19, 1992, incorrect scaling constants for the channel III resistance temperature detectors were entered into the Eagle 21 protection system and were improperly verified as correct by the field supervisor.

This is a Severity Level IV violation (Category 1).



RESPONSE TO FINDING

1. Florida Power and Light (FPL) Company concurs with the finding.
2. Cause of the violation:

The Resistance Temperature Detector (RTD) has three constants which are used to relate resistance to temperature. These constants come from a data sheet supplied by Westinghouse which relates the RTD serial number to its respective constants. The Westinghouse procedure for replacing the RTD required a data sheet which related tag number to serial number. The error of interchanging the RTD constants resulted from not having the data from the Westinghouse procedure for replacing the RTD when the parameters were updated. The data was verbally transmitted and not verified against the Westinghouse procedure. This error was caused by the lack of attention to detail by the journeyman and the field supervisor.

3. Corrective steps which have been taken and the results achieved:
 - a. The Turkey Point journeyman and field supervisor involved were counseled in accordance with Nuclear Division policy.
 - b. A Plant Work Order was issued to correct the RTD temperature constants. The work was completed on 9/19/92.
 - c. Procedure O-GMI-102.26 was revised to add independent verification for adequacy of the documents to be used for system parameter update, and to clarify supervisor signature blocks and step numbers. In addition, a formal transmittal sheet for RTD parameters is required. The procedure was revised on 11/5/92.
 - d. Procedures 3/4-PMI-059.8, 3/4-PMI-059.9, and 3/4-PMI-059.10 were revised to obtain information necessary for a periodic review of all the protection system parameters. The procedures were revised on 11/5/92.
4. The corrective steps to be taken to avoid further violations:
 - a. The procedure used for RTD replacement was a Westinghouse procedure. An FPL procedure will be written for installation of RTDs. This procedure will include data transmittal forms for use in updating the protection system parameters. The FPL procedure will be completed by 1/15/93.
5. The date when full compliance was achieved:

Full compliance was achieved on 9/19/92 with the correction of the RTD T-Cold temperature constants.



6. Other information:

Interchanging the RTD constants had no effect on the T-Cold signal used for protection and safeguards signals because the constants swapped were for two RTDs measuring the same temperature. In this case, the two T-Colds for Loop C are averaged internally to develop the protection T-Cold signal. Calculations have shown that this average signal from two RTDs, with their constants swapped, is the same as the temperature input to the RTDs. Therefore, this interchange of RTD constants had no effect on nuclear safety.

