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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
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 50-250/92-28 &
50-251/92-28. Corrective actions: fire protection sys walkdown
performed to assure correct sys alignment & proper locking
of valves & valves properly secured on 921110.

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JAN 25 1993

L-93-008
10 CFR 2.201

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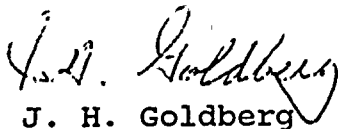
Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Reply to Notice of Violation
NRC Inspection Report 92-28

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/JEK/JK

Attachment

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

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9302030032 930125
PDR ADDCK 05000250
Q PDR

an FPL Group company



ATTACHMENT

REPLY TO A NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
NRC Inspection Report 92-28

FINDING:

Technical Specification 6.8.1.h requires that written procedures be established, implemented, and maintained covering activities referenced in the facility Fire Protection Program.

The Fire Protection Program, described in Appendix 9.6A of the facility Final Safety Analysis Report, paragraph 7.1, states:

The Fire Protection Program at Turkey Point Units 3 and 4 is established by procedure. The procedures shall provide surveillance and maintenance requirements for fire protection equipment and systems.

Procedure O-OP-16.1, Fire Protection Water System, Attachment 1, Fire Protection Water System Valve Alignment, requires that valves 10-753, Raw Water Tanks Tie; 10-759, Full Flow Recirculation Isolation; and 10-777, Raw Water Tank II Outlet to Jockey Pumps, be locked in the closed position.

Contrary to the above, on November 10, 1992, valves 10-753, 10-759, and 10-777 were found in the closed position, but were not properly locked in position. The locks were secured to the valve yokes, and not through the handwheels as required to lock the valves in the closed position.

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



RESPONSE TO FINDING

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

On November 8, 1992, the Assistant Nuclear Plant Supervisor directed operators to perform the Fire Protection System alignment in accordance with 0-OP-016.1, Fire Protection Water System, Attachment 1, Fire Protection Water System Valve Alignment, which required the following alignment:

1. Valve 10-777 --- Locked and Closed
2. Valve 10-759 --- Locked and Closed
3. Valve 10-753 --- Locked and Closed

Attachment 1 signoffs indicate the closure and locking of all the above valves. Operators, as part of performance of 0-OP-016.1, documented that the valves were locked and were independently verified in the locked position. However, on November 10, 1992, the valves were found in the closed position, but the locks were not in a configuration that would prevent re-positioning of the valves. FPL has not been able to determine conclusively the cause of the misapplication of the locks. But, FPL believes the most likely cause is that the valves were improperly locked during the verification.

3. Corrective steps which have been taken and the results achieved:
 - a. The locks on the three valves were properly locked in the closed position.
 - b. The Fire Protection System was walked down in accordance with procedure 0-OSP-16.27, Fire Protection System Flowpath Verification, to assure correct system alignment and the proper locking of valves which are required to be locked. No other discrepancies were found.
4. The corrective steps to be taken to avoid further violations:
 1. This event will be discussed by Operations Management in operator meetings with personnel responsible for the locking and verification of valve positions, stressing the importance of properly locking valves in accordance

with O-ADM-205, Administrative Control of Valves, Locks, and Switches. These discussions will be completed prior to January 31, 1993.

2. Further control will be placed over the valve lock system for Fire Protection System locked valves. The lock sets will be replaced and the key control for the keys to these locks will be enhanced. This change will be completed by May 15, 1993.
5. The date when full compliance was achieved:

The valves were properly secured on November 10, 1992, immediately after identification of the discrepancy.