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PLUNKETT, T.F. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to 940218 ltr request to amend util TS & RAI to support technical review of proposed license amends. NRC questions encl.

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FPL

AUG 05 1994

L-94-119
10 CFR 50.90

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

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. '50-250 and 50-251
Request for Additional Information (RAI) -
Proposed License Amendments
Administrative Controls - Audit Frequencies
and Implementation of Generic Letter 93-07

By letter L-94-017, dated February 18, 1994, Florida Power and Light Company (FPL) submitted a request to amend Turkey Point Units 3 and 4 Technical Specifications. In a conference call between the NRC and FPL, the staff requested additional information to support the technical review of the proposed license amendments. The response to these NRC questions is enclosed.

Should there be any questions, please contact us.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Plant

Attachments

TFP/RJT/rt

cc: S. D. Ebnetter, Regional Administrator, Region II, USNRC
T. P. Johnson, Senior Resident Inspector, USNRC, Turkey Point
W. A. Passetti, Florida Department of Health and Rehabilitative
Services

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STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

T. F. Plunkett being first duly sworn, deposes and says:

That he is Vice President, Turkey Point Nuclear Plant, of Florida Power and Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.

T. F. Plunkett

T. F. Plunkett

Subscribed and sworn to before me this

5th day of August, 1994.

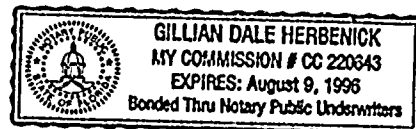
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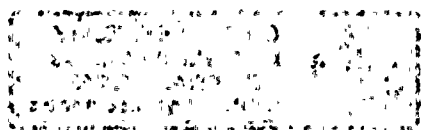
Name of Notary Public (Type or Print)

NOTARY PUBLIC, in and for the County of
Dade, State of Florida

My Commission expires 8/9/94
Commission No. CC 220643

T. F. Plunkett is personally known to me.





FLORIDA POWER AND LIGHT COMPANY

TURKEY POINT UNITS 3 AND 4

RESPONSE TO NRC QUESTIONS

ON THE

PROPOSED LICENSE AMENDMENTS:
ADMINISTRATIVE CONTROLS - AUDIT FREQUENCIES
AND IMPLEMENTATION OF GENERIC LETTER 93-07

RESPONSE TO NRC QUESTIONS

In a conference call between the NRC and FPL, the staff requested additional information to support the technical review of the proposed license amendments. The response to these NRC questions is enclosed.

Question:

Confirm that the current Turkey Point Emergency and Security Plans, includes requirements of an annual audit and implementing procedures.

Response:

Florida Power and Light (FPL) Company acknowledges that the current Turkey Point Emergency and Security Plans, include the requirement of an annual audit, in accordance with Parts 50 and 73 of Title 10 of the Code of Federal Regulations. In addition the Emergency and Security Plans include provisions to maintain implementing procedures of these programs.

Question:

A January 1994 Safety Evaluation approved removal of fire protection from the Turkey Point Technical Specifications (TS), in accordance with GL 88-12. GL 88-12 states that the existing administrative control requirements related to fire protection audits would be retained. However, the subject TS will change the existing administrative control requirements. Provide additional justification to support the proposed change.

Response:

In FPL's proposed license amendment submittal (L-94-017, dated February 28, 1994), FPL proposed deleting the frequencies specified in the Technical Specifications for the Company Nuclear Review Board (CNRB) Audits. The periodicity of these audits would be controlled as described in the FPL Topical Quality Assurance Report (FPLTQAR). The minimum audit frequency for any activity would be established as biennial unless the audit is otherwise required to be performed more frequently in accordance with the Technical Specifications, Code of Federal Regulations or other licensing commitments.

In the area of fire protection, Turkey Point's Technical Specifications currently address three different audit intervals. These intervals include: (a) an annual audit of the fire protection equipment and program implementation; (b) a biennial audit of the fire protection programmatic controls including implementing procedures; and (c) a triennial audit of the fire protection equipment and program implementation using an outside independent fire protection consultant. In FPL's proposed license amendment submittal, FPL proposed changing the audit interval from annually to a biennial frequency, maintaining the current biennial audit and performing the

triennial audit on a more frequent basis than currently required by the Technical Specifications.

FPL justified the proposed change by stating that the proposed change would allow the specific audit frequency to be adjusted based upon programmatic performance up to a maximum of two years. The fire protection program performance is, and will continue to be, assessed through self-assessments, management reviews, performance evaluations and audits in related areas, and other trend indicators. Increasing the audit interval frequency to biennially (2 years) will not impact compliance with provisions of the Technical Specifications, but will provide for more meaningful audits of those activities conducted less frequent and allow for additional focus on operational activities.

The resultant comprehensive audit of fire protection equipment, programmatic controls including implementing procedures, and program implementation will be performed by a qualified audit team which will include at least a lead auditor from FPL's Nuclear Assurance department and an outside independent fire protection consultant (presently required only for a triennial audit). The minimum audit frequency will be biennial; however, more frequent audits may be conducted based on audit results. The proposed amendments do not alter the technical or Quality Assurance (QA) requirements which are required to be audited to verify compliance with Turkey Point's fire protection program. In fact, the effectiveness of the audit program will be enhanced by the increased utilization of outside expertise, and management flexibility for directing QA resources will be improved.

The administrative controls for the Fire Protection Program for Turkey Point Units 3 and 4 are defined in Section 6.0 of the Turkey Point Technical Specifications. The existing administrative controls for Turkey Point's Fire Protection Program continue to maintain requirements for the training program for the fire brigade, audits of the fire protection, and programmatic controls including the implementing procedures and program implementation utilizing outside independent fire protection consultants. FPL does not believe that the change from an annual to a biennial audit frequency changes the intent of the administrative control requirements, since all Fire Protection Program audit activities currently being conducted will continue.

Quality Assurance's oversight of the fire protection program is comprised of various layers of reviews (including Audits, Performance Monitoring (PMONs) Reports, surveillances, and procedure reviews) and consists of continuous rather than discrete monitoring. Continuous monitoring of the fire protection program is ensured through the use of PMONs, surveillances and review of Condition Reports, as discussed below.

The top tier of QA oversight is the formally-scheduled audit. Quality Assurance views this type of auditing as "discrete" monitoring. The Quality Assurance philosophy is to shift away from discrete monitoring



(evaluation of activities that may occur during the scheduled audit), and to shift to continuous monitoring (evaluation of activities when they occur). The proposed change in the frequency of this discrete monitoring will be offset by the increase in continuous monitoring with no reduction in the effectiveness of QA oversight.

FPL's QA program would require increased oversight of the fire protection program based on the following requirement:

- o Topical Quality Assurance Report (FPLTQAR 1-76A), TQAR 18.0, "Audits", Section 18.2.2 states that "regularly scheduled audits shall be supplemented, as required to cover unforeseen events or changes in requirements."

The relocation of Fire Protection from the Technical Specifications to the Updated Final Safety Analysis Report (UFSAR) would constitute a change in requirements that would necessitate additional QA oversight. The March 1994 FPL Quality Assurance Audit reviewed the Fire Protection Program, following the relocation of the fire protection requirements from the TS, and found the program satisfactory.

Another level of review by Quality Assurance is ensured through the procedure review process. This review process is detailed in the following program documents:

- o FPLTQAR 1-76a, TQAR 2.0, "Quality Assurance Program," Section 2.2.2, states "Quality Instructions shall be reviewed by the Quality Assurance Department at each revision."
- o Plant Procedure, O-ADM-100, "Procedure Preparation, Review, and Approval", Section 3.1.7, states "Ensuring Quality Assurance (QA) receives a copy of the draft upgraded/new [Quality Instruction] QIs and Administrative Procedures for the following:
 - 1. To review all draft upgraded/new QIs and Administrative Procedures prior to [Plant Nuclear Safety Committee] PNSC approval in accordance with the Quality Assurance Manual."

As the fire protection program requirements are defined in Administrative Procedures, Quality Assurance review of any proposed changes should identify any potential reductions in commitments relative to fire protection.

Continuous monitoring of fire protection activities are ensured through the use of PMON reports and surveillances, both of which are used as major inputs for the formally scheduled audit. The use of PMONs and surveillances ensures that critical evolutions are monitored and provides early warning of performance issues. A PMON is a limited scope audit based on the monitored activity. As an example, a PMON may be used to verify that the plant's procedures comply with UFSAR/Appendix R requirements, while a surveillance would be used to verify that the plant is properly implementing those procedures. A combination of PMONs and surveillances may be used during the two



years leading up to the formally scheduled audit to cover such activities as fire brigade training, transient combustible controls, hot work permits, or fire detection.

Additionally, surveillances are scheduled through the Turkey Point Quality Department Quality Instruction (QI 10.1), "Inspections and Surveillances". Section 5.2.2 of QI 10.1, states that "surveillances shall be scheduled to cover the activities listed in Appendix A on a periodic basis." Appendix A of QI 10.1, item 1.1 identifies fire protection as an activity requiring periodic surveillances. The surveillance schedule presently requires fire protection to be reviewed on a quarterly basis.

This surveillance can be focused to look at the recent changes in fire protection as appropriate.

The last tool available for Quality Assurance is the review of Plant Condition Reports. Condition Reporting is the plant-wide process to report any deviation, procedure violation, etc. Approximately 1000 Condition Reports (CRs) were generated at Turkey Point in 1993. Presently, CRs are reviewed on a daily basis by a plant oversight group for potential impact. Quality Assurance is part of this oversight group and applicable CRs may be funneled to the responsible QA auditor for follow-up.

Summary

FPL's Nuclear Assurance department will continue to direct its resources during the two year interval leading up to and including the formal audit to ensure the following activities are covered:

- Verification that necessary procedures exist and comply with baseline QA standards, Regulatory Guides, Technical Specifications, Updated Final Safety Analysis Report (UFSAR), NUREGs, Generic Letters, etc.,
- Analysis of all Licensee Event Reports (LER's), problem reports, in-house event reports, NRC Inspection Reports, etc., associated with the functional area for trends and input to the audit,
- Review of the effectiveness of self-assessment activities,
- Assessment of the effectiveness of corrective actions taken in response to Quality Assurance/Quality Control (QC) activities since the last audit,
- Review and utilization of QA/QC activity results since the last audit,
- Verification of implementation of requirements not verified in the interval leading up to the formal audit,
- Verification of the effectiveness of utilizing operating experience to include INPO Significant Operating Experience

Reports (SOERs) and INPO Significant Event Reports (SERs), and

- Overall review of the effectiveness of fire protection.

This approach will ensure that critical evolutions are monitored, provide early warning of performance issues, and provide more meaningful input to the outside fire protection consultant.

Question:

With respect to the Fire Protection Program, FPL should provide more technical bases or justification for the amendment change. FPL stated that the audit frequency will be adjusted based upon programmatic performance and will be assessed through performance evaluations and trend indicators. FPL should provide additional data and information that indicates that the audit frequency can be extended with its application. In addition, FPL wants to take credit for enhancements as justification for the proposed amendment. In fact, the enhancements, for example, increased utilization of outside expertise, are allowed by the existing TS. Therefore, they are not enhancements.

Response:

Turkey Point's plant performance has shown a continually improving Fire Protection Program that justifies modifying the audit frequency to biennially. A review of NRC Inspection Reports and FPL QA Audit Reports over the past 5 years (1989 - present) supports this conclusion.

NRC Inspection Reports

During this time period, there has been only one cited violation. Beginning with a major NRC inspection of the 10 CFR 50 Appendix R requirements (Inspection Reports 50-250/89-37 and 50-251/89-37) which identified no violations; followed by a review of the Fire Protection Program and restoration efforts after Hurricane Andrew (Inspection Reports 50-250/92-23 and 50-251/92-23) that identified 4 strengths and 1 weakness; and culminating in the most recent SALP report (Inspection Reports 50-250/93-03 and 50-251/93-03) that stated:

"The results indicated that the fire protection program improved over the previous SALP period..",

and resulted in a SALP 1 rating; all justify fire protection as an area that would qualify for a longer audit interval.

L-94-119
Enclosure
Page 6 of 6

FPL's QA Audit Reports

Beginning in 1989 and proceeding through 1994, the six FPL QA audit reports of Turkey Point's Fire Protection Program did not identify any significant programmatic or implementation issues. The 1993 triennial audit which utilized an outside independent fire protection consultant identified several strengths, which included: timeliness of repairs to the fire protection system following Hurricane Andrew, fire brigade response to an unannounced back-shift drill in a contaminated area, and the knowledge level of site and corporate personnel. The 1994 audit has not identified any new or repeat problems.

In addition, FPL's commitment to utilize an outside independent fire protection consultant every two years as opposed to every three years as currently required by Turkey Point's Technical Specifications, will also ensure proper oversight of fire protection activities.

