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50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251

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SUBJECT: Responds to violation noted in Insp Repts 50-250/94-13 &
50-251/94-13. Corrective actions: IST Coordinator reassigned
to another position & independent review of surveillance
scheduling program being performed by FP&L QA Dept.

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L-94-225
10 CFR 2.201

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


Gentlemen:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 251
Reply to A Notice of Violation
NRC Inspection Report 94-13

Florida Power & 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/CLM/cm

Attachment

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

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PDR ADDCK 05000250
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 94-13

FINDING:

"Technical Specification 4.0.5.a requires inservice testing of ASME Code Class 1, 2, and 3 valves to be performed in accordance with Section XI of the Boiler and Pressure Vessel Code and applicable Addenda. The current 10 year inservice test program dated October 28, 1993, identifies the valves and testing criteria to meet the requirements of Technical Specification 4.0.5.a.

Administrative procedure, 0-ADM-502, Inservice Testing Program, implements the current 10-year program. Surveillance procedures 4-OSP-22.4, EDG Fuel Oil Transfer Pump and Valve Inservice test; 3 and 4-OSP-047.1, Charging Pump/Valves Inservice Test; and, 3 and 4-OSP-050.2, Residual Heat Removal System Inservice test require that the valves identified in procedure 0-ADM-502 be exercised on a quarterly frequency and set forth the testing method.

Contrary to the above, 4-OSP-22.4 was not fully performed in January 1993, July 1993, and January 1994; 3-OSP-047.1 was not fully performed in May 1993 and February 1994; 4-OSP-047.1 was not fully performed in February 1994; 3-OSP-050.2 was not fully performed in May 1993 and August 1993; and 4-OSP-050.2 was not fully performed in April 1994. This resulted in 33 inservice valve tests affecting a total of nine Unit 3 and eleven Unit 4 valves not being performed during the period January 1993 to July 1994.

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



RESPONSE TO FINDING

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

Immediate Cause

The immediate cause of the violation was that the scheduling of stroke time surveillance performances was not adequate to ensure that they were done. Administrative procedure 0-ADM-215 describes the scheduling of plant surveillances by reference to specific surveillance procedures, but some surveillances are listed in 0-ADM-215 by train or component, some are listed by surveillance procedure section, and some surveillance procedures are listed in their entirety.

The computer software used to implement 0-ADM-215 contained similar inconsistencies, one of which was that the pump surveillances were scheduled, with the expectation that the valve exercising would be performed in conjunction. As an example, sections 7.1 and 7.2 of 4-OSP-22.4 direct the surveillance on the 4A and 4B Emergency Diesel Oil Transfer pumps, respectively, while section 7.3 directs the performance of the Inservice Test (IST) stroke timing on valves SV-4-3434 A & B. The Plant Surveillance Tracking Program contained specific scheduling line entries for the surveillances on the 4A and 4B pumps, but contained no specific line entry for the valve exercises. The result of these inconsistencies was that valve surveillances were occasionally not performed.

Root Cause

In the past, IST pump surveillances were performed and reviewed by the System Performance Group in the Technical Department. After an IST pump surveillance was complete, the IST valve surveillance was performed by Operations, at the direction of Technical Department, in order to complete the procedure. About two years ago, the review and performance of the IST pump surveillances were separated. Surveillance performance moved from Technical Department to Operations Department, while final surveillance review to ensure all testing is completed remained with Technical Department.

The old methods of ensuring the performance of the IST valve surveillances sufficed for Technical Department. New methods were not adequately implemented for the Operations Department by the IST Coordinator. This implementation deficiency was not recognized. As a result, the scheduling of the IST valve surveillances was not fully implemented into processes to ensure a clear understanding of what testing was required when the surveillance test responsibility was transferred to Operations.

The root cause of this event is cognitive personnel error. The IST Coordinator is responsible for ensuring IST program changes are incorporated into plant procedures, and for ensuring conformance to plant procedures pertaining to IST. The missed surveillances were discovered by the System Performance Supervisor (supervisor of the IST Coordinator).

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

The IST Coordinator has been reassigned to another position. Duties of the IST Coordinator are being fulfilled by the System Performance Supervisor, while a new IST Coordinator is completing his training for the position.

The maintenance history for all twenty valves was reviewed. No operability concerns existed during the period of the missed surveillances.

Since the process for controlling surveillances changed two years ago, the past two years of IST valve surveillance history was reviewed. No other instances existed of missed IST surveillances on valves. Since scheduling procedures track pump surveillances specifically no review of pump surveillance history was performed.

For the specific surveillance procedures directing the performance of IST surveillances on pumps and valves, a signoff step has been added to the affected subsections for the pump testing sections, which specifically directs that the valve exercising be performed quarterly.

The Plant Surveillance Tracking Program (computer software used to implement 0-ADM-215) has been revised to include line entries for each valve or pump inservice test section, in lieu of identifying the procedure as a whole.

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

An independent review of the surveillance scheduling program is being performed by the FPL Quality Assurance Department. Actions taken as a result of any findings and/or recommendations arising from this review, coupled with the actions already completed and described above, are expected to minimize the possibility of further violations in this area.

5. The date when full compliance was or will be achieved:

Full compliance was achieved on July 21, 1994, when verification was completed that all 20 valves identified in the finding above, had been satisfactorily exercised in a quarter subsequent to the quarter in which the surveillance was missed, and that all required quarterly inservice tests on valves were current.

