



June 4, 1979
L-79-151

JUN 11 1979
4:49

Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
101 Marietta Street
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII:JPO
50-250, 50-251
IE Bulletin 79-06A

The attached information is submitted as a follow-up to our initial response to the subject Bulletin.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/MAS/paf

Attachment

cc: Robert Lowenstein, Esquire

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UPDATED RESPONSES TO IE BULLETIN 79-06A

MAY 31, 1979

RESPONSE 1

No additional information.

RESPONSE 2

Specific briefings and training conducted in recognition of events at TMI have provided all personnel associated with our nuclear unit operation with an intense awareness of the possibility of formation of steam bubbles and/or release or production of noncondensable gases in the primary system under certain extreme conditions. Review of the actions recommended by our procedures for coping with transients and accidents, has revealed some opportunities to enhance their functional quality. The current status of this effort may be summarized as follows:

- a) Review to date indicates our basic procedures are sound, but amenable to improvement.
- b) Analyses and extensive reviews by the NSSS vendor are scheduled to produce revised generic emergency operating procedures by about mid June 1979.
- c) All licensed operating personnel are participating in casualty training on a simulator. This program has begun and is scheduled for completion by the end of June. In addition to the intensified training, critical review of our emergency operating procedures is being conducted by application on the simulator.

By incorporating appropriate vendor recommendation and simulator experience into our procedure changes, we expect to achieve useful improvements. Prior to full implementation of this program, special instructions have been issued and training conducted to foster prevention of steam bubble formation when possible and enhance core cooling by monitoring and maintaining the reactor coolant in a subcooled state (determined by reference to pressure, temperature and saturation curves in the control room), monitoring and maintaining a heat sink via the operable steam generators, and by maintaining reactor cooling inventory. Natural circulation capability has been demonstrated in these units, and the aforementioned actions enhance and ensure that a natural circulation flow is established.

RESPONSE 3

Control circuit modifications have been completed on both units to automatically initiate safety injection exclusive of pressurizer level, i.e., initiation of safety injection in the event a transient is experienced where the pressurizer pressure drops to the safety injection set point (1715 psig) on 2 out of 3 channels.

RESPONSE 4

Modifications have been completed such that Turkey Point Units 3 & 4 now utilize automatic initiation of SI solely based upon pressurizer pressure (see response 3). Automatic SI initiation results in automatic containment isolation (phase A isolation). The present Turkey Point Units 3 & 4 containment isolation design meets the intent of item 4 of the bulletin.

RESPONSE 5

No additional information

RESPONSE 6

INDICATIONS AVAILABLE TO OPERATOR FOR DETERMINING PORV STATUS

A leak or open PRZ power operated relief valve may be indicated by one or more of the following control room indications:

1. An unexplained increase in temperature observed on any of the following indicators:

TI-*-463 PRZ power operated relief valve line temperature
TI-*-465 PRZ safety valve relief line temperature
TI-*-467 PRZ safety valve relief line temperature
TI-*-469 PRZ safety valve relief line temperature

2. PRZ power relief line high temperature alarm (alarms at 20°F above containment ambient temperature).
3. PRZ safety valve line A, B, or C high temperature alarm (alarms at 20°F above containment ambient temperature).
4. An increase observed on PRT temperature, level, or pressure indicators.
5. PRT high temperature, high level, high pressure alarm.
6. An increase in frequency of auto makeup to the RCS.
7. A sudden PRZ pressure decrease as indicated on:

PR-*-444 - PRZ pressure

PI-*-455 - CH I PRZ pressure

PI-*-456 - CH II PRZ pressure

PI-*-457 - CH III PRZ pressure

8. PRZ control high/low level alarm and charging pump low speed alarm

NOTE: The procedure does instruct the operator to close the isolation valve if the PORV is stuck open.

RESPONSE 7

- (a) Special instructions presently in effect, fully adhere to the bulletin requirements. The actual procedure changes will be made upon conclusion of the activities mentioned in item 2.
- (b) Special instructions presently in effect, fully adhere to the bulletin requirements on operation of HPSI pumps. The instructions have been audited and approved by I/E inspection. The actual procedure changes will be made after resolution of the differences between the NSSS vendor recommendation, and the bulletin requirements.
- (c) Reactor Coolant Pump status is the same as item (b) above.
- (d) Operator interim training emphasized looking at plant parameters other than pressurizer level to evaluate plant conditions. Additionally, existing emergency operating procedures require monitoring multiple parameters.

RESPONSE 8

We have reviewed our administrative control of valves, locks and switches and believe that our current program is effective. All valves on the "Valve Lock and Switch List" have been field verified. Additionally our USNRC Project Inspector randomly selected safety systems and field verified proper system line-up during his inspection from 5/1/79 -5/3/79. We have identified some potential areas for improvement during our procedure review. All procedure revisions should be completed no later than July 31, 1979.

RESPONSE 9

Our initial response to this item identified the only containment isolation valves that could return to their normal position upon resetting of containment isolation, e.g. containment purge, instrument air bleed, main steam, containment sump discharge.

FPL committed to revising the control scheme such that these valves would remain closed. The design is in progress, the plant change modification package is being prepared and the changes will be implemented in a practical timely manner. However, until these changes are implemented, as mentioned in our initial response, interim special instructions to the operators remain in effect.

RESPONSE 10

We have completed our procedure review and have identified only a few areas where the procedures may be enhanced. However, the staffs concerns in Items 10 a, b, and c are addressed generically in AP 0103.4, "In-Plant Equipment Clearance Orders" and AP 0190.19, "Control of Maintenance on Nuclear Safety Related Systems."

The changes identified in our review to enhance the procedures are being processed. All of these revisions should be completed no later than July 31, 1979.

RESPONSE 11

We have reviewed your recommendation for prompt reporting and an "open communication" channel. We feel that the proposed communications network and facilities for a resident inspector as discussed with Messers. Long and Cherdemi of the USNRC I&E Region II, and Mr. Melville of the USNRC - Bethesda (during their on-site visit) fully address the intent of this issue and their concerns. In the interim, a special instruction which adheres to the bulletin requirements remains in effect.

RESPONSE 12

No additional information