P. O. BOX 14000, JUNO BEACH, FL 33408

FLORIDA POWER & LIGHT COMPANY

December 16, 1982
L-82-544

Mr. James P. O'Reilly
Regional Administrator Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250, 50-251
IE Inspection Report 82-34

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

There is no proprietary information in the report.

Very truly yours,

Robert E. Uhrig

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/js

Attachment

cc: Harold F. Reis, Esquire

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250, 50-251
IE INSPECTION REPORT 82-34

FINDING:

Technical Specification 6.8.1 requires that procedures be implemented. Administrative Procedure 0103.11, Housekeeping, requires that thermal pipe insulation be replaced immediately after maintenance. Administrative Procedure 0190.19, Control of Maintenance on Nuclear Safety-Related and Fire Protection Systems, requires the Quality Control Department to review Plant Work Orders (PWOs) to insure their adequacy prior to maintenance.

Contrary to the above, Step 8.1.5 of Administrative Procedure 0190.19 and Step 8.2 of Administrative Procedure 0103.11 were not implemented in that the QC pre-job review did not identify on PWO-4426 dated September 9, 1982, the absence of provisions for reinstallation of lagging on the safety injection flow path lines served by heat tracing circuit 54. Subsequent to the maintenance on said circuit, the lagging was not restored to its original condition. This resulted in the plant operating within a Technical Specification action statement with low boron injection tank piping temperature for approximately 9 hours on October 3, 1982.

RESPONSE:

1. FPL concurs with the finding.

2. This finding was caused by the lower than required priority given to heat tracing circuit repair, operation, and inspection.

3. All QC Inspectors were re-instructed concerning their responsibilities when pre-reviewing Plant Work Orders. Special emphasis was placed on work involving heat tracing circuits and associated insulation.

   Insulation was replaced on the safety injection flow path lines and proper operation verified. An inspection was made of all other critical heat tracing circuits to verify that no other problems existed.

4. Training in heat tracing principles and operation has been completed by Operations, Electrical Maintenance and QC Inspectors. This program emphasized the importance of heat tracing to plant safety and limits of the Technical Specifications.

   Plant procedures were reviewed and revised as follows: A new maintenance procedure for heat tracing circuits was issued. The procedure includes requirements to re-install insulation following repair of heat tracing circuits. Operating procedures were changed to include actions to eliminate possible incorrect indications due to flow in heat traced piping and details on time allowed by Technical Specifications to eliminate problems and to include system drawings of heat tracing circuits.

Nuclear Operator logs have been improved and a log control system put into effect to improve record keeping and professionalism. Quality Control is reviewing these logs and insures that Plant Work Orders are written on defective heat tracing circuits.

The QC Department has increased the inspections of heat traced boric acid piping and a periodic inspection program is being developed that will include insulation installation and heat tracing circuit operation.

5. Full compliance will be achieved by January 31, 1983.