



February 1, 1983  
L-83-49

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 82-36

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,

A handwritten signature in dark ink, appearing to read "Robert E. Uhrig", is written over a horizontal line.

Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/PLP/js

Attachment

cc: Harold F. Reis, Esquire  
PNS-83-LI-043-1

## ATTACHMENT

RE:       TURKEY POINT UNITS 3 AND 4  
          DOCKET NOS. 50-250, 50-251  
          IE INSPECTION REPORT 82-36

### FINDING:

10 CFR 50, Appendix B, Criterion V as implemented by Section TQR 5.0 of FPL Topical Report FPL-NQA-100, requires that activities affecting quality of nuclear safety related components be prescribed by documented instructions and be accomplished in accordance with these instructions. Also, Section TQR 13.0 of the aforementioned Topical Report requires that components which are to be incorporated into a safety-related system of a nuclear power plant shall be stored in accordance with written procedures to implement design document requirements. Westinghouse Process Specification NPT-91, paragraphs 3, 4 and 6, prescribes specific requirements for inert environment and surveillance, for the interior of steam generator lower assemblies in order to minimize oxidation and/or corrosion of vessel (steam generator) materials. In addition, FPL Power Plant Engineering Letter No. JPES-PTPM-821039 dated July 29, 1982, references NPT-91; cautions against leaving the secondary side of the steam generators without nitrogen purge and states that Steam Generator 2992 (SG "B") was without purge as of that date. In addition, the letter prescribes methods for establishing and maintaining purge as required by the aforementioned specification.

Contrary to the above, on December 1, 1982, nitrogen purge requirements were not in compliance with the aforementioned specification as the pressure gage on SG "B" lower assembly showed no positive pressure, less than one (1) psig in SG "A", and less than the minimum 3 psig in SG "C".

### RESPONSE:

1. FPL concurs with the finding.
2. As stated in the NRC report, work was being performed on the replacement steam generator lower assemblies which necessitated removing the Nitrogen purge. The purge was not adequately reestablished on the B lower assembly, due to an oversight.
3. A Non-Conformance Report was generated on 12/3/82 to rectify the situation and the purge was adequately reestablished as of that date. Westinghouse has stated that no damage is expected nor is any additional investigation or examination required.
4. In order to prevent further findings, a daily inspection on the three generators was performed from 12/3/82 until each generator went into Unit 4 Containment for installation.
5. Full compliance was achieved on 12/3/82.