



83 FEB 9 AM 40

February 3, 1983
L-83-53

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 and 50-251
IE Inspection Report 82-37

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 cursive script, appearing to read "J A de Mastry" or similar, written over the typed name.

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/js

Attachment

cc: Harold F. Reis, Esquire
PNS-LI-83-083-1

8303010604 830218
PDR ADOCK 05000250
Q PDR

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
 DOCKET NOS. 50-250, 50-251
 IE INSPECTION REPORT 82-37

FINDING:

10 CFR 50.59 requires that for plant changes a written safety evaluation shall be prepared which provides the basis for the determination that the change does not involve an unreviewed safety question. Step 8.4.4.3 of Administrative Procedure 0190.15, "Plant Projects - Approval, Implementation and Regulatory Requirements", requires a documented safety evaluation for changes to safety-related systems demonstrating that the change neither introduces an unreviewed safety question nor adversely affects any safety-related equipment.

Contrary to the above, a safety evaluation was not performed prior to effecting the following two changes:

- (1) Removal of pressure transmitter PT-934 from the Unit 3 Boron Injection Tank discharge header on April 8, 1982, and subsequent power operation of Unit 3 in the absence of this transmitter.
- (2) Introduction on July 19, 1982, of a blank plate in the place of flow orifice F.T. 943 on the safety injection system (SIS) and subsequent return of the SIS to unrestricted service for approximately 2-1/2 days.

RESPONSE:

In response to the first example;

1. FPL does not agree that 10 CFR 50.59 required a written safety evaluation prior to the removal of PT-934. However, FPL concurs that an adequate review of subsequent power operation of Unit 3 in the absence of PT-934 was not performed.
2. The reason for the finding was that, although our procedures required the clearance order which authorized removing PT-934 from service be reviewed for safety considerations prior to starting up Unit 3, the procedures do not adequately prescribe the depth or the details of the review.
3. As immediate corrective action, the operation of Unit 3 without PT-934 was evaluated and found to not involve any unreviewed safety questions.
4. Corrective action to prevent further violations by upgrading the clearance review during startup is under review and will be submitted in a follow-up response by March 19, 1983.
5. Full compliance was achieved when the safety evaluation was performed which occurred prior to January 25, 1983.

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2. In response to the second example;

(1) FPL concurs with the finding.

(2) The reason for the finding was that it was erroneously determined that the proper control for the temporary installation of the plate would be by an equipment clearance order, which did not require a written safety evaluation.

(3) As corrective action:

a. An Engineering evaluation was made of the original plate which included a stress analysis at which time a recommendation was made to replace the plate due to concerns of permanent deformation even though the plate was determined to be in the allowable range for failure due to breakage caused by high pressures (1500 psi).

b. The plate was removed and the system restored to normal by replacing the flow orifice (FT-4-943) prior to startup of Unit 4.

(4) Corrective action to prevent further violations is under review and will be submitted in a follow-up response by March 19, 1983.

(5) Full compliance was achieved when the system was restored to normal, which occurred prior to July 26, 1982.