

USNRC REGION
ATLANTA, GE

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March 11, 1983
L-83-134

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 83-01

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
Vice President
Advanced Systems & Technology

REU/PLP/js

Attachment

cc: Harold F. Reis, Esquire
PNS-LI-83-157-1

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PDR ADOCK 05000250
G PDR

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250, 50-251
IE INSPECTION REPORT 83-01

FINDING:

10 CFR 50.55(a)(g)(ii) requires that inservice testing to verify operational readiness of pumps and valves whose function is required for safety be accomplished in accordance with Section XI of the ASME B and PV Code. ASME B and PV Code Section XI, 1980 edition, thru Winter 1980, addenda, paragraph IWA 2300 requires the licensee to establish a visual examination qualification program consistent with ANSI N45.2.6 - 1973 for personnel performing operability examinations on pumps and valves.

Contrary to the above, inservice testing of pumps and valves whose function is required for safety was not accomplished in accordance with Section XI of the ASME B and PV Code in that the licensee had not established a visual examination qualification program consistent with ANSI N45.2.6 - 1973 for personnel performing operability examinations on pumps and valves.

RESPONSE:

FPL does not occur with the finding for the following reasons:

- A. Section IWA-2300 of Section XI of the ASME Code is titled qualifications of Non-Destructive Examination Personnel and delineates requirements for the qualification of personnel performing non-destructive examinations. IWA-2200 lists the types of examinations as visual, surface, and volumetric and further states that Tables IWB-, IWC-, IWD-2500-1 and IWF-2500-2 specify the examination methods to be used and do not address pump and valve inservice testing. Pump and valve inservice testing is performed in accordance with Articles IWP and IWV of the code. These sections apply specifically to inservice testing and define inservice testing to be a special information through measurement or observation to determine the operational readiness of a pump or valve, and is consistent with the definition of test IWA-2110(k). The performance of the inservice testing as prescribed in IWP and IWV does not even appear in IWP or IWV. Furthermore, IWP and IWV do not define the personnel qualification requirements for performing pump and valve tests.

- B. On November 8, 1982, the ASME issued a revision to a Section XI inquiry (ASME File #BC 82-340): "qualification requirements for personnel performing testing of Pumps and Valves". The ASME reply was:

The qualification of individuals making the observations, the measurements and recording the results required by Subsections IWP and IWV shall be in accordance with the Owner's Quality Assurance program for training and qualification of plant and contractor personnel.

FPL's Pump and Valve inspection personnel are qualified in accordance with FPL's Quality Assurance program as stated in response C below.

- C. Qualification requirements for Turkey Point plant personnel are as stated in Technical Specification 6.3, Facility Staff Qualifications, and in the FPL Topical Quality Assurance Report (TQAR), Appendix C, which endorses (with some exceptions) Regulatory Guide 1.58, Qualification of Nuclear Power Plant Inspection Examination and Testing Personnel. Technical Specification 6.3 essentially endorses ANSI N18.1 - 1971. Regulatory Guide 1.58 as committed to in the FPL TQAR, which was approved by NRC on August 2, 1982, requires that quality control inspectors performing preoperational and operational inspection, examination, and testing be qualified to ANSI N45.2b - 1978 and that all other operating plant and support personnel performing preoperational and operational inspection, examination and testing be qualified to ANSI N18.1 - 1971 and Regulatory control inspectors, the TQAR as summarized above requires personnel performing pump and valve testing be qualified to ANSI N18.1 - 1971 and Regulatory Guide 1.8. These documents do not require establishment of a visual examination qualification program consistent with ANSI N45.2.b.
- D. The personnel performing Pump and Valve testing are fully competent to satisfactorily implement the Pump and Valve Inservice Testing Program in accordance with the applicable sections of the ASME Code. The competence of these personnel has been demonstrated by the program's success in meeting the intent of the Code.