



July 1, 1983
L-83-387

Mr. James P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
IE Inspection Report 83-09

83 JUL 7 AM 11:47
USNRC REGION II
ATLANTA, GEORGIA

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 "Robert E. Uhrig".

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/js

Attachment

cc: Harold F. Reis, Esquire

ATTACHMENT

Finding

B. Technical Specification 6.8.1 requires that procedures be implemented. The following are two examples of failure to implement procedures.

1. Administrative Procedure (AP) 103.2, Duties and Responsibilities of Operators on Shift and Maintenance of Operating Logs and Records, requires Technical Specification (TS) time limits to be logged in the Equipment Out of Service List.

Contrary to the above, the TS time limit associated with the March 9, 1983 removal from service of the 4A high head safety injection pump was not listed in the Equipment Out of Service List.

2. Off Normal Operating Procedure (ONOP) 11208.1, Area Radiation Monitor System-Off Normal Operation, step 5.1.3.3 requires the "Horn Disable" light on the area radiation monitor panel to be reset.

Contrary to the above, on March 9, 1983 the "Horn Disable" light was not reset.

Response

1. FPL concurs with the finding.
2. The first example was caused by the operator assuming that, since Unit 4 was shut-down and defueled for the Steam Generator Replacement Project, the 4A high head safety injection pump was not required to be operable by the Unit 3 Technical Specification LCO.

The second example was caused by the operator forgetting to reset the "Horn Disable" light.

3. An inter-office memo has been sent to all Plant Supervisors - Nuclear to notify them to require licensed operators on shift of their responsibilities to look-up Technical Specification time limits when in doubt and also to reset the "Horn Disable" light on the area radiation monitor panel when necessary.
4. To avoid future violations the Training Department will review with licensed operators on shift the requirement in procedures to 1) reset the "Horn Disable" light when necessary, 2) properly fill out the out-of-service log.
5. Full compliance will be by September 2, 1983.

ATTACHMENT

Finding

- A. Technical Specification 6.8.1 requires that procedures be implemented. Administrative Procedure 190.25, Compliance Review Program, requires a compliance review sheet to be prepared for each TS amendment.

Contrary to the above, a compliance review sheet was not generated as required for TS amendments 82 and 76 to Facility Operating Licenses DPR-31 and DPR-41 respectively. Consequently TS surveillance requirements 4.8.1.b and 4.8.1.B.3 were not incorporated in a procedure for periodic accomplishment.

Response

1. FPL concurs with the finding.
2. The finding occurred because at the time the Technical Specification amendments were approved it was determined that an interdepartmental meeting with the personnel who would be responsible for the performance of the new surveillance activities would be a more effective means of implementing the new requirements than the formal compliance review. The meeting was held and documented by the interoffice correspondence referenced in the inspection report.
3. As corrective action, the following was done:
 - A. The requirements of the amendments were reviewed and it was determined that the other requirements had been proceduralized.
 - B. The requirement in Technical Specification 4.8.1.b was incorporated into Chemistry Procedure NC-2.
 - C. When it was later found that the procedure implementing Technical Specification 4.8.1.B.3 was inadequate, responsibility was assigned to appropriately revise procedures to fully implement the requirement.
4. A new procedure, Administrative Procedure 0103.18, has been written and implemented to govern implementation of changes to Technical Specifications. This new procedure will prevent recurrence of the finding.
5. Full compliance has been achieved prior to 6/27/83. The inadequacies found in the procedure implementing Technical Specification 4.8.1.B.3 will be remedied in a procedure by August 5, 1983, which is prior to the next scheduled surveillance test to meet the requirements.