



January 23, 1984  
L-84-15

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

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inspection Report 83-36

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 cursive script, appearing to read "J. W. Williams, Jr.", is written over a horizontal line.

J. W. Williams, Jr.  
Vice President  
Nuclear Energy Department

JWW/PLP/js

Attachment

cc: Mr. James P. O'Reilly, Region II  
Harold F. Reis, Esquire  
PNS-LI-84-35

8402280244 840209  
PDR ADDCK 05000250  
Q PDR

ATTACHMENT

RE:       TURKEY POINT UNITS 3 AND 4  
          DOCKET NOS. 50-250, 50-251  
          IE INSPECTION REPORT 83-36

FINDING:

10 CFR 50 Appendix B, Criterion IV, and the licensee's accepted QA Program (FPL-NQA-100A, Revision 6), TQR4, collectively require that measures be established to assure that applicable regulatory requirements are suitably included or referenced in documents for procurement of materials.

Contrary to the above, measures have not been established to assure that applicable regulatory requirements are included or referenced in documents for procurement of materials in that:

1. Plant procedures have not been provided for determining that materials (spare and replacement parts) are purchased to specifications and codes equivalent to those specified for the original equipment.
2. Procedures have not been provided to assure consistency between corporate and plant staffs concerning classifications of materials. Additionally, procedures have not been provided to handle unresolved issues between corporate and plant staffs relative to safety classification differences.

RESPONSE:

1. First Example:

- A. FPL concurs with the finding.
- B. The reason for the finding is that the requirement to purchase replacements equal to or better than the original quality has been so ingrained into our purchasers no one noticed it wasn't specifically stated in the plant procedure.
- C. As corrective action, it has be reaffirmed that plant QC procurement document reviewers understand the requirement to buy replacement material equal to or better than original equipment.
- D. In order to prevent recurrence, appropriate plant procedures will be revised to assure spare parts are purchased equal to or better quality than original equipment.
- E. Full compliance will be achieved by March 31, 1984.

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RESPONSE: (cont'd)

2. Second Example:

- A. FPL concurs with the finding in part. As discussed with the inspector, a procedure exists for the resolution of issues between corporate and plant staff relative to safety classification differences. Final classification is the responsibility of power plant engineering, but plant disagreements with classifications are routinely resolved through the request for engineering assistance system, which is embodied in a corporate procedure.
- B. It was our judgement that our established QA program and Quality Procedures involved with safety and quality classification provided sufficient guidance and controls for the spare parts ordering process.
- C. and D. As corrective action, a new procedure will be developed to formalize our practices concerning engineering review of procurement documents. This procedure is scheduled to be completed for corporate review by April 20, 1984.
- E. Full compliance will be achieved by July 31, 1984 when the procedure is scheduled to be implemented.