

USNRC REGION II
ATLANTA, GEORGIA



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October 4, 1983
L-83-508

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 & 4
Docket Nos. 50-250 and 50-251
Inspection Report 83-27

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

There is no proprietary information in this report.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Robert E. Uhrig". The signature is fluid and cursive, written over a light background.

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/cab

Attachment

cc: Harold F. Reis, Esquire

8311070494 831026
PDR ADOCK 05000250
Q PDR

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250, 50-251
IE INSPECTION REPORT 83-27

FINDING A:

Technical Specification Section 6.8.1 requires that written procedures be established implemented and maintained that meet or exceed the requirements and recommendations of NRC Regulatory Guide 1.33 and the facility fire protection program. The fire protection/prevention procedure to safely control the welding and burning operations by the construction organization is Procedure ASP-17, Fire Prevention.

Contrary to the above, the requirements of Procedure ASP-17 were not being implemented in that:

1. A welding and cutting permit had not been obtained for welding operations being conducted within the Computer Room and in the Unit 3 Component Cooling Pump Area as required by ASP-17, Section C.4.
2. Welding operations in the Computer Room were being conducted directly over combustible cardboard boxes which is not permitted by ASP-17, Section 6.1.2.
3. Permits in use did not indicate that the required followup fire prevention inspection 30 minutes after each work period were being accomplished.
4. Designated fire watch personnel for the welding and cutting operations were not identified by wearing red vests as required by ASP-17, Section 6.13.

RESPONSE A:

1. FPL concurs with the finding.
- 2.(1) A welding and cutting permit had been issued for work in the Unit 4 component cooling area. The job supervision for the welding operations in the Unit 3 component cooling area erroneously believed that their work was also covered because of the proximity of the two areas.

A welding and cutting permit had been issued to one group of workers in the Computer Room. The job supervision for another group of workers erroneously believed that they were also covered under this permit.
- (2) The worker was not aware that he was welding over combustible material or of the applicable requirements.
- (3) The requirement to sign the welding and cutting permit to document the followup inspection was not understood by the Craft Foreman. A revision to the permit form had deleted the specific signature block specifically for documenting the followup inspection and had added several lines which were intended to be used for more than one followup inspection.
- (4) Firewatch personnel were not wearing red vests because it was incorrectly understood that the only area on site that the requirement applied to was inside containment.

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3. Immediate corrective action taken was:

- (1) Welding and cutting operations in the areas were stopped until a proper permit was obtained.
- (2) The area was cleaned prior to proceeding with welding operations.
- (3) Procedure ASP-17 has been revised to emphasize the Craft Foreman's responsibility to perform the required followup inspections and to sign and date the welding and cutting permit each time an inspection is made.
- (4) Construction Procedure ASP-17 is being reviewed and it will be revised, if necessary, to clarify or modify the red vest requirement.

In addition, the following generic corrective actions have been taken. All Construction personnel involved with work in the plant have been indoctrinated concerning the welding and cutting requirements in Procedure ASP-17. Fire prevention measures have been and will continue to be stressed at the weekly craft safety meetings. Quality Assurance surveillance has been increased to ensure compliance with approved procedures and good fire prevention practices. This has resulted in greater overall awareness of and compliance with fire prevention requirements.

4. To avoid further violations, fire prevention requirements and commitments are being reviewed by the plant fire protection personnel. Continued indoctrination, safety meetings and surveillances will be maintained to keep fire prevention awareness high.

Administrative Procedure 0190.67, Welding and Cutting Safety, has been re-evaluated and determined by our fire protection staff to need revision. This procedure will be revised by February 1, 1984, to include the following NRC guidelines:

- A. 10 CFR 50 Appendix R, III K.5
- B. Nuclear Plant Fire Protection Function Responsibilities, Administrative Controls and Quality Assurance provided in NRC letter dated February 2, 1978.
 - 1) Paragraph 1.0
 - 2) Paragraph 2.0.b (1), (2), (3) and (4).

5. Full compliance to current requirements was achieved by September 20, 1983.

FINDING B:

Technical Specification Section 6.8.1 requires that written procedures be established, implemented and maintained that meet or exceed the requirements of NRC Regulatory Guide 1.33. Technical Specification Section 6.8.3 states that temporary changes to these procedures may be made provided that:

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- The intent of the original procedures is not altered.
- The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operators license on the unit affected.
- The change is documented, reviewed by the PNSC and approved by the Plant Manager - Nuclear within fourteen days of implementation.

Contrary to the above, the welding and cutting permit required by Procedure ASP-17, Fire Prevention, was revised, issued and was used prior to the permit form being reviewed and approved by the plant management staff and the plant manager.

RESPONSE B:

1. FPL concurs with the finding.
2. The Welding and Cutting Permit Form was revised to incorporate the standard precautions, which had been previously handwritten on each permit. The individual revising the form did not realize changing the form also changed the procedure.
3. A temporary deviation to Procedure ASP-17 was issued immediately to reflect the new form and also to clarify the responsibility to perform and to document followup fire prevention inspections.
4. In order to prevent recurrence, ASP-2 will be revised to clarify the requirements on temporary deviations and to establish a program to insure temporary deviations are properly reviewed. After the procedure is revised, necessary personnel will be reindoctrinated, in accordance with current procedures, in the requirements regarding procedure changes and temporary deviations.
5. Full compliance will be achieved by December 31, 1983.