

USNRC REGION II
ATLANTA, GEORGIA

83 NOV 3 PI2: 15



October 31, 1983

L-83-543

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 83-26

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,

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

JWW/PLP/js

Attachment

cc: Harold F. Reis, Esquire
PNS-LI-83-687

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PDR ADOCK 05000250
Q PDR

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250, 50-251
IE INSPECTION REPORT 83-26

FINDING:

- A. Technical Specification (TS) 6.8.1 requires that written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USNRC Regulatory Guide 1.33.

Steps 5.3.4.1(1) and (2) of ANSI N18.7-1972 further require:

- (1) Prerequisites. Startup procedures shall include determination that prerequisites have been met, including confirmation that necessary instruments are operable and properly set; valves are properly aligned; necessary systems procedures, tests, and calibrations have been completed; and required approvals have been obtained. Check-off lists should be used for this purpose.
- (2) Main Body. The main body of the startup procedures shall include the major steps of the startup sequence, including reference to appropriate system procedures. Such major steps shall include or reference detailed instructions for their performance, for example, minimum instrumentation requirements, coverage of control rod withdrawal sequence or soluble poison dilution, manipulation of controls, and establishment of feed and steam flow. Check-off lists should be used for the purpose of confirming completion of major steps in proper sequence.

Contrary to the above, as of July 25, 1983, procedures 0202.1, Reactor Startup - Cold Condition to Hot Shutdown Conditions, dated May 20, 1983, and 0202.2, Unit Startup - Hot Shutdown to Power Operation, dated May 12, 1983, do not specify the prerequisites or provide procedural steps for movement of shutdown rods.

RESPONSE:

- (1) FPL concurs with the finding.
- (2) Some prerequisites for withdrawal of the shutdown banks were listed under Section 4.0, Precautions and Limitations, of Operating Procedures 0202.1 and 0202.2. However as stated in the finding, procedural steps were not included to specify that the trip breakers be reset, that the rod control system be reset, and that the rod control urgent failure alarm be reset. No reason could be determined as to why these steps were not included in the procedure. We can only assume that upon reaching the step which required shutdown bank withdrawal, that classroom and simulator training had made the reactor operator knowledgeable in what had to be done to permit shutdown bank withdrawal. If these prerequisite items had not been completed, the shutdown banks could not be withdrawn.
- (3) As corrective action, the supervisor in charge of the procedure review project was asked to review all procedures that may require shutdown bank withdrawal criteria and related steps and to recommend appropriate revisions. As a result recommended changes to Operating Procedure 0202.1 and 0202.2 referenced above and 0205.2, Reactor Shutdown - Hot Shutdown to Cold shutdown, were submitted to plant management for review and comment. Comments have been resolved and the procedures will be presented to PNSC at the next regularly scheduled meeting.

RE: TURKEY POINT UNITS 3 AND 4
 DOCKET NOS. 50-250, 50-251
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- (4) Long term corrective action will consist of reviewing Operating Procedure 0204.3, Initial Criticality After Refueling, and making necessary changes to incorporate shutdown bank withdrawal criteria and steps. In addition, the Procedure Review Project Supervisor is reviewing ANSI - 18.7 and Regulatory Guide 1.33 and will take appropriate action to assure that procedures being reviewed meet these guides and standards.
- (5) Full compliance will be achieved by December 1, 1983.

FINDING:

- B. Technical Specification 6.8.1 requires that procedures be implemented. Procedure Administrative Procedure 0190.15, Plant Projects - Approval, Implementation, and Regulatory Requirements, requires procedures to be listed which are effected by plant change/modifications (PC/M).

Contrary to the above, as of July 25, 1983, Administrative Procedure 0190.15 was not fully implemented in that Emergency Procedure 20005, Control Room Inaccessibility, was incorrectly omitted from the list of procedures affected by PC/M 80-117 and thus was not revised to reflect the modifications done on the Auxiliary Feedwater System. This omission resulted in a control room inaccessibility procedure which was inadequate to guide the operator during an emergency situation which required use of the Auxiliary Feedwater System.

RESPONSE:

- (1) FPL concurs with the findings.
- (2) During the initial review of procedures affected by PC/M 80-117, Emergency Procedure 20005 was identified as needing revisions by the Operations Project Coordinator. Because Emergency Procedure 20005 is an Emergency Operating Procedure (EOP), the Operations Project Coordinator called the Chairman of the EOP Committee in the Nuclear Operations Training Department to relate that it needed revisions as a result of PC/M 80-117. The EOP Chairman was not fully aware of the urgency to revise the procedure and because Emergency Procedure 20005 was scheduled to be reviewed as part of a longer term procedure review project (which the EOP Chairman also heads up), assumed that the revisions could be included during the longer term review. Therefore, the procedure did not get revised in parallel with implementation of the PC/M. There were no further checks and balances to catch this oversight.
- (3) As corrective action, the Operations Project Coordinator has reviewed the importance of timely emergency procedures changes resulting from PC/M changes with the EOP Chairman. Emergency Procedure 20005 has been revised and approved to reflect the modifications made by PC/M 80-117.
- (4) PC/M scheduling meetings are now being held to assure that all aspects of implementing a PC/M are identified and scheduled. The Operations Project Coordinator and a Training Department PC/M Coordinator are assigned to attend these scheduling meetings. Procedure changes and the department responsible for making the changes are identified at the scheduling meetings. The scheduling sequence requires that procedure changes are approved prior to turnover to Operations of systems affected by the PC/M.
- (5) Full compliance was achieved on October 27, 1983.