



January 27, 1984
L-84-21

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 83-32

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 dark ink, appearing to read "J. Williams, Jr.", is written over a horizontal line.

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

JWW/PLP/js

Attachment

cc: Harold F. Reis, Esquire
PNS-LI-84-36

8405070438 840302
PDR ADOCK 05000250
Q PDR

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250, 50-251
IE INSPECTION REPORT 83-32

FINDING A:

Technical Specification 6.2.1 requires in part that written procedures be established and implemented.

Contrary to the above, Operating Procedure (OP) 1001.1, dated May 20, 1983, Filling and Venting the Reactor Coolant System (RCS), was not properly implemented in that:

- (1) The fill of the RCS on August 17, 1983, from 40% pressurizer level (wide range indication) to an indication of off-scale high was performed prior to the confirmation of a proper alignment and test of the Overpressure Mitigating System as required by Steps 8.3.1 through 8.3.3 and 8.7.
- (2) Procedurally the only recognized method of water addition to the RCS was via a single charging pump on slow speed. The fill of the RCS as described in the paragraph above was performed with a primary water transfer pump without using OP 1001.1.
- (3) Steps of OP 1001.1 were being marked not applicable (N/A) without the shift supervisor's authorization as required.

RESPONSE:

1. FPL concurs with the finding.
2. The reason for this finding was that the shift personnel did not fully comply with the procedure.
3. As corrective action the RCS fill was immediately terminated and the operating shift was counseled on adherence to all procedures. The fill and vent procedure was discussed and it was explained that certain steps, marked with an asterisk, could be marked N/A for a partial fill and that all other steps shall be complied with.
4. This finding was a topic during a Operations Department Supervisor's staff meeting. Adherence to procedures has also been reemphasized in plant management meetings and in management meetings with plant personnel and corporate managers.
5. Full compliance was achieved on September 30, 1983.

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FINDING B:

Technical Specification 6.8.1 requires that written procedures be established and maintained.

Contrary to the above, on August 18, 1983, Administrative Procedures (AP) 0103.5, Administrative Control of Valves, Locks and Switches, dated April 17, 1983, and Operating Procedure 0202.1, Reactor Startup - Cold Condition to Hot Shutdown Conditions, dated May 12, 1983, were found to have not been maintained to reflect the configuration of the Emergency Containment Filter System as modified by Plant Change/Modification 80-096.

RESPONSE:

1. FPL concurs with the finding.
2. The reason for the finding is that our startup turnover program was inadequate. The reason, corrective action, and full compliance date will be fully discussed in our response to Inspection Report 250/83-41 and 251/83-40.

FINDING C:

Technical Specification 6.8.1, and paragraph 5.1.6.1 of ANSI N18.7-1972 as implemented by plant AP 0190.19, Control of Maintenance on Nuclear Safety-Related and Fire Protection Systems, require that maintenance which can affect the performance of nuclear safety-related equipment be appropriately preplanned. In support of the preplanning FPL Topical Quality Assurance Report, TQR 4.0 and Quality Procedure (QP) 4.1, Rev. 13, Control of Requisitions and the issuance of Purchase Order for Spare Parts, Replacement Items and Services, requires, in Step 5.1.1, that the originator of a requisition include information such that the item requested is described in enough detail that it is clear what is desired. Additionally, step 5.8 requires the item description to be in sufficient detail to allow a normal Stores Department inspection to be satisfactory to assure that the item meets the requirements of the original equipment and the needs of the plant.

Contrary to the above, the preplanning for the work described in plant work orders PW0-2053 and 2054 was inadequate in that it failed to include in the work package, a plant maintenance instruction, entitled Packing Valves Using Grafoil Dieformed Packing, which contains specific directions on the installation of anti-extrusion rings with an accompanying diagram depicting the relative position of the rings with respect to the actual grafoil packing. Additionally, the "requisition on purchasing agent" (RPA) number 575-7102, for packing of motor operated valves MOV-535 and MOV-536, failed to provide enough detail in the description of the packing. Consequently, maintenance was performed on two valves using the wrong packing.

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RESPONSE:

1. FPL concurs with the finding.
2. The work package did not include the maintenance instruction because the individual compiling the package wasn't aware of the instruction. The RPA didn't provide enough detail because the packing had previously been bought from a vendor who knew what packing was being ordered, but then the order was given to a new vendor.
3. As corrective action, the appropriate packing was obtained and installed in the valves. In addition, all packages of grafoil packing in Stores were inspected and restored so that all packages now contain the proper packing rings.
4. In order to prevent recurrence, all appropriate mechanical maintenance personnel were trained in the proper packing of valves using grafoil packing and the hardcard for the packing was rewritten to include sufficient detail.
5. Full compliance was achieved prior to January 26, 1984.