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May 29, 1984  
L-84-142

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

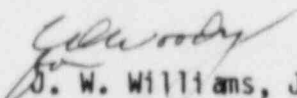
Dear Mr. O'Reilly:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inspection Report 84-12

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,

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

JWW/SAV/js

Attachment

CC: Harold F. Reis, Esquire  
PNS-LI-84-192

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Q PDR

## ATTACHMENT

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
IE Inspection Report 84-12

### Finding

10 CFR 50, Appendix B, Criterion V as implemented by paragraph 5.1 of the accepted Quality Assurance Program requires activities affecting quality to be accomplished in accordance with procedures. Florida Power and Light Turkey Point Maintenance Procedure MP 1107.3, Reactor Coolant Pump Impeller Removal and Replacement, all revisions to and including September 2, 1982, Steps 9.10 and 9.93 require Fel-Pro-C5A lubricant to be used to lubricate reactor coolant pump studs prior to installation.

Contrary to the above, activities affecting quality were not accomplished in accordance with procedures in that the 3A reactor coolant pump studs were lubricated with Fel-Pro-N-5000.

### Response

- 1) FPL concurs with the finding.
- 2) The reasons for the finding was the Plant Maintenance Procedure MP 1107.3, Reactor Coolant Pump Impeller Removal and Replacement, was not strictly adhered to. A lubricant (Fel-Pro-N-5000) qualified to be used on nuclear safety related equipment/components was utilized during performance of task as documented on Plant Work Order (PWO), but an On The Spot Change was not written to validate the deviation from lubricant Fel-Pro-C5A as stipulated in such procedure.
- 3) As corrective action, MP 1107.3 has been revised to reflect the correct lubricant to be used. The procedure change is in the approval state and it is expected to be completed by June 15, 1984.
- 4) In order to preclude recurrences, Mechanical Maintenance personnel are being counselled in the importance of strict adherence to procedures.
- 5) Full compliance will be achieved by July 1, 1984.