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March 1, 1984
L-84-51

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 83-40/39

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. W. Williams, Jr.", is written over the typed name.

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

JWW/PLP/djc

Attachment

cc: Director, Office of Inspection and Enforcement, USNRC
USNRC Document Control Desk
Harold F. Reis, Esquire
PNS-LI-84-73

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PDR ADDCK 05000250
G PDR

ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250, 50-251
Inspection Report 83-40/39

FINDING

Technical Specification 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 Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USNRC Regulatory Guide 1.33.

Section 5.3.1 of Off-Normal Operating Procedure 0208.1, requires that a post trip review be performed in accordance with Appendix A, in order to determine the cause of the trip and to insure any safety considerations are resolved prior to unit startup.

Contrary to the above, Unit 4 was restarted on October 16, 1983, without completing a post trip review.

RESPONSE:

1. FPL concurs with the finding. However, the trip was evaluated to identify and verify the cause and to verify proper automatic action of affected protection equipment, though this evaluation was not in accordance with Appendix A of Off-Normal Operating Procedure 0208.1.
2. The reason for the finding was that the operator determined the trip did not require a post trip review. This determination was based on the following:
 - 1) The trip occurred with the reactor subcritical.
 - 2) Because of the plant conditions at the time of the trip (reactor subcritical, turbine shutdown, and main steam stop valves closed), the procedure (ONOP 0208.1, which is written for reactor/turbine trips from power operation), did not apply.

- 3) The post trip review, which is Appendix A to the procedure, therefore, was not required.
3. As corrective action a post trip review in accordance with Appendix A of ONOP 0208.1 was performed.
4. In order to prevent recurrence, the following actions were taken:
 - 1) This finding was reviewed with all the Plant Supervisors - Nuclear during an Operations Department meeting.
 - 2) A training review was developed and presented to all licensed operators on the requirement to perform post trip reviews for evaluating all reactor trips that do not originate from procedural requirements of a normal shutdown or test procedure.
 - 3) The review of ONOP 0208.1 already in process was expanded in scope to encompass the area of post trip reviews and the procedure's purpose so that the procedure will state post trip reviews are required for subcritical trips. Appendix A to ONOP 0208.1 has been compared to the draft INPO Good Practice on post trip reviews and, by the end of May 1984, Appendix A will be revised to be consistent with the draft INPO Good Practice.
5. Full compliance was achieved November 15, 1983, when the post trip review was completed.