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APR 5 1985

L-85-142

Dr. J. Nelson Grace
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, Georgia 30323

Dear Dr. Grace:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Inspection Report 250-85-05 & 251-85-05

Florida Power and 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 a light-colored background.

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

JWW/SAV/mj

Attachment

cc: Harold F. Reis, Esquire
PNS-L1-85-140

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PDR ADOCK 05000250
Q PDR

ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket No. 50-250, 50-251
IE Inspection Report 250-85-05 and 251-85-05

FINDING:

10 CFR 50.55a(g) requires that inservice testing, to verify operational readiness, of pumps and valves whose function is required for safety, be accomplished in accordance with Section XI of the ASME Boiler and Pressure Vessel (B and PV) Code. ASME B and PV Code, Section XI, 1980 edition through Winter 1980 addenda, has been identified as the applicable code for inservice testing. ASME B and PV Code, Section XI, Paragraph IWV-3415, requires fail-safe valves be tested by observing the operation of the valves upon loss of actuator power. The Main Steam Isolation Valves have been identified as fail-safe valves.

Contrary to the above, inservice testing of pumps and valves and inservice inspection of components were not accomplished in accordance with ASME B and PV Code, Section XI, in that the Main Steam Isolation Valves were fail-safe tested with the instrument air actively connected to the valve actuators.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was that an air reservoir cylinder existed in the air line to the main steam isolation valve (MSIV) actuator and it was assumed that air would always be available to the valve whether or not the instrument air supply was isolated.
- 3) An evaluation is underway to determine fail-safe testing requirements and acceptance criteria for the MSIVs in accordance with ASME B and PV Code, Section XI. The results of this evaluation will be incorporated into the current inservice testing program at Turkey Point, as applicable to the testing of the MSIVs.
- 4) FPL has implemented a Program for Improved Operation that was described in our letters L-84-265 dated September 28, 1984 and L-84-275 dated October 3, 1984. As part of the scope of this program, operability and acceptance criteria are being developed to ensure that adequate testing and acceptance criteria is available to meet the operability requirements as described in the FSAR and Technical Specifications.
- 5) Full compliance for Item 3 above is scheduled to be achieved by August 1, 1985.