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July 25, 1985  
L-85-287

Dr. J. Nelson Grace  
Regional Administrator, Region II  
U.S. Nuclear Regulatory Commission  
101 Marietta Street N.W. Suite 2900  
Atlanta, GA 30303

Dear Dr. Grace:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inspection Report 250-84-23 and 251-84-24

Florida Power & Light Company has reviewed the NRC letter dated June 25, 1985, regarding our previous response to the above referenced report. A response to subsection 4.a is attached as requested.

Should you have any further questions on this information, please contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "John C. Velotta".

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

JWW/PLP/ta  
Attachment

cc: Harold F. Reis, Esquire  
PNS-LI-85-275

8508120183 850725  
PDR ADOCK 05000250  
Q PDR

## ATTACHMENT

Re: Turkey Point Units 3 and 4  
Docket No. 50-250, 50-251  
Inspection Report 84-250-23 and 84-251-24

### FINDING 4.a

Technical Specification 6.8.1 requires that written procedures and administrative policies shall be established, implemented, and maintained.

Administrative Procedure 0103.17 establishes the procedure for systems or equipment acceptance and turnover to the plant staff. It charges the startup test group with the responsibility for the walkdown of the system to identify discrepancies and to have the operating drawings updated.

Contrary to the above, AP 0103.17 was not implemented in January through May 1984 during the turnover of the Pressurizer Heater Circuit Modification, PC/M 81-29 and 81-30, in that, the discrepancy of the bypass switches not being labeled was not identified and the operating drawing change to incorporate PC/M 81-30 was not accomplished.

### RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was personnel oversight in that drawing 5610-T-L1, Sheet 23, Revision 8, that was issued to incorporate PC/M 81-30 for Unit 4, did not delete the notation that the Pressurizer Keylock Switch only applied to Unit 3. The descriptive functions of these switches were inadvertently omitted during installation, check out, and review of PC/Ms 81-29 and 81-30.
- 3)
  - a) The Drawing Update Group revised drawing 5610-T-L1, Sheet 23, to delete the note that referred to Unit 3 only, thus including Unit 4.
  - b) In response to the NRC Resident Inspector's concerns, temporary labels were installed on the switches to indicate their function. These labels have since been replaced with permanent labels.
- 4)
  - a) This event has been discussed with Drawing Update personnel at Turkey Point to reemphasize the requirements for updating drawings adequately upon completion of PC/Ms and the significance of complying with this requirement.

- b) In order to enhance an ongoing PC/M constructability review process, PC/M review guidelines will be developed to include a review of the adequacy of the functional description of labels for new equipment and/or components.
  - c) Administrative Procedure (AP) 0190.15, "Plant Projects - Approval, Implementation and Regulatory Requirements", will be revised to include a requirement for the implementing department to ensure adequate identification of equipment and/or components prior to PC/M turnover to the plant.
- 5) a) Full compliance for item 3.a above was achieved by July 27, 1984.
- b) Full compliance for item 3.b above was achieved by July 10, 1985.
- c) Full compliance for item 4.a was achieved by April 2, 1985.
- d) Full compliance for items 4.b and 4.c above will be achieved by September 1, 1985.