



86 JAN 31 A 9:18

JAN 24 1986  
L-86-31

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

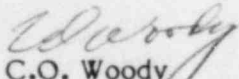
Dear Dr. Grace:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inspection Report 250-85-24 and 251-85-24

A revised response to the subject inspection report is attached. These revisions were the subject of discussions with members of the Region II staff.

There is no proprietary information in the report.

Very truly yours,

  
C.O. Woody  
Group Vice President  
Nuclear Energy Department

COW/PLP/mg  
Attachment

cc: Harold F. Reis, Esquire

8602060024 860124  
PDR ADOCK 05000250  
G PDR

## ATTACHMENT

Re: Turkey Point Units 3 and 4  
Docket No. 50-250, 50-251  
IE Inspection Report 85-250-24 and 85-251-24

### FINDING 1:

Technical Specification (TS) 3.5, Instrumentation, delineates the conditions of the instrumentation and safety circuits necessary to ensure reactor safety. Table 3.5-2, Engineered Safety Features Actuation, Item number 1.5, requires the high steam flow in two of three steam lines with the low average temperature safety injection (SI) circuit to be operational when the reactor is not in cold shutdown. Note 2 of Table 3.5-2 states that this safety injection signal may be manually bypassed when cooling down the reactor and the average temperature is below 543 degrees F.

Contrary to the above, on May 30, 1985, following a Unit 4 reactor trip, the high steam flow in two of three steam lines with low average temperature safety injection circuit was intentionally made unavailable by use of the SI block switch. The SI signal was manually blocked when average coolant temperature was above 543 degrees F. No reactor cooldown was in progress. The safety circuit remained blocked for approximately one hour.

### RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was operator judgment during an off-normal condition (loss of a vital instrument bus) and a coincident failed instrument channel (Tave). The judgment was based on confirmed plant parameters outside the failures and the desire to minimize an undue challenge to the safeguards system as a result of a spurious signal being generated by an instrument failure.
- 3) Operating Procedures (OPs) 0205.1, "Unit Shutdown - Full Load to Hot Shutdown Condition", and 0205.2, "Reactor Shutdown - Hot Shutdown to Cold Shutdown Condition", have been reviewed and revised to emphasize the Technical Specification (TS) requirement of maintaining the safety injection signal in an unblocked condition when the reactor coolant system (RCS) temperature is greater than 543 degrees Fahrenheit or the RCS pressure is greater than 2000 psig regardless of plant conditions.
- 4) A training brief was issued to emphasize the procedure changes in Item 3.
- 5) a) Full compliance for Item 3 above was achieved by August 31, 1985.  
b) Full compliance for Item 4 above was achieved by September 6, 1985.

**FINDING 2:**

TS 6.8.1 requires that written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33.

Appendix A of USNRC Regulatory Guide 1.33, Section 8, Item (1)K, recommends that surveillance procedures be written covering control rod operability and scram time tests. Operating Procedure (OP) 1604.8, dated April 16, 1984, entitled CRDM/RPI Stepping and Drop Time Test, provides instructions for performing the rod control cluster stepping test, the rod drop time test and the rod position indication system calibration. Figure 1 of OP 1604.8 identifies the proper way to perform the rod drop time measurements.

Contrary to the above, on June 25, 1985, OP 1604.8 was not properly implemented, in that rod drop time measurements for shutdown bank A were calculated in a manner contrary to that identified in Figure 1 of the procedure. This resulted in the recording of erroneous rod drop travel times for shutdown bank A.

**RESPONSE:**

- 1) FPL concurs with the finding.
- 2) The reason for the finding was failure to comply with the Appendix R requirements of OP 1604.8.
- 3) The rod drop times for shutdown bank A were immediately recalculated. This increased the rod drop times by less than 0.1 seconds. The average rod drop time of 1.335 seconds remained well below the Technical Specification 3.2.3 limit.
- 4) Strict procedural compliance was re-emphasized to the responsible people upon identification of the problem.
- 5) Full compliance for Items 3 and 4 above was achieved by June 26, 1985.

**FINDING 3:**

TS 4.1, Operational Safety Review, requires that equipment and sampling tests shall be conducted as specified in Table 4.1-2. Item 10 of Table 4.1-2 requires that accumulator boron concentration be sampled prior to heatup above 200 degrees F.

Contrary to the above, on June 22, 1985, the Unit 3 primary coolant system was heated above 200 degrees F without prior performance of the accumulator boron concentration analysis.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) At the time of the incident, the accumulators were drained and preparations were being made for a reactor coolant system heatup to greater than 200 degrees Fahrenheit. A conflict in sampling criteria vs. equipment availability criteria was misinterpreted thus allowing an on-the-spot change (OTSC) to be made to Operating Procedure (OP) 0202.1, "Reactor Startup - Cold Shutdown to Hot Shutdown Conditions", that moved the accumulator sampling to a later step in the procedure. Another factor contributing to this misinterpretation was the Overpressure Mitigating System (OMS) Technical Specification which does not allow opening of motor operated valve (MOV)-869 with the reactor coolant system temperature below 380 degrees Fahrenheit. MOV-869 is opened when filling the accumulators.
- 3) The OTSC was cancelled in order to re-establish the TS requirement back into the procedure at the proper sequence.
- 4)
  - a) The TS upgrade project and associated changes directed at reduced conflicts and improved action statements should aid in preventing recurrence of this type of incident. Completion of this action is presently covered under the Performance Enhancement Program schedules and controls.
  - b) Administrative Procedures 0-ADM-100, "Procedure Preparation, Review, and Approval", and 0109.3, "On The Spot Changes to Procedures", will be revised to provide improved guidance to the individuals responsible for preparing procedure changes and on-the-spot (OTSCs) for FSAR and Technical Specification reviews. A Quality Improvement Team has evaluated the preparation of OTSCs and has prepared guidelines for the determination of whether a proposed OTSC constitutes a change of intent to a procedure. These guidelines have been issued for trial implementation, and the final guidelines and associated administrative process selected by the QIP Team will be incorporated into appropriate plant procedures. If the intent is not being changed, the OTSC will be processed as usual. Should the proposed OTSC involve a change in the intent, the revision will not be allowed and will require processing as a permanent procedure change. These permanent procedure changes will receive the appropriate reviews for FSAR and Technical Specification applicability.
- 5)
  - a) Full compliance for Item 3 above was achieved by July 2, 1985.
  - b) Full compliance for Item 4.b above was achieved by January 16, 1986.