



September 15, 1978  
L-78-300

Mr. James P. O'Reilly, Director, Region II  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303


Dear Mr. O'Reilly:

Re: RII:MVS  
50-335/78-17

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,

  
Robert E. Uhrig  
Vice President

REU/MAS/cpc

Attachment

cc: Harold F. Reis, Esquire

7810230052



ATTACHMENT

Re: RII:MVS  
50-335/78-17

Finding

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained for surveillance and test activities of safety-related equipment. Technical Specification 6.8.3 allows temporary changes to such procedures provided:

- (a) The intent of the original procedure is not altered.
- (b) The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- (c) The change is documented, reviewed by the FRG and approved by the Plant Manager within 14 days of implementation.

In addition, FPL Procedure QI5-PR/PSL-1 (Preparation, Revision, Review/Approval of Procedures) Section 5.5.4 delineates these same requirements for temporary changes to safety-related procedures after fuel loading.

Contrary to the above:

Procedure changes were made to Operating Procedure No. 0420050 (Containment Spray - Periodic Test, Pump and Valve Operability) during the performance of "A" header surveillance on July 5, 1978 and during the performance of "B" header surveillance on July 19, 1978, without the required management approval and without any documentation for subsequent Facility Review Group (FRG) review and Plant Manager approval.

Response

The Finding involved the informal correction of valve numbering discrepancies in Operating Procedure 0420050. We agree that there were discrepancies in the procedure and that temporary changes to the procedure must comply with Technical Specification 6.8.3. The procedure has been formally corrected, reviewed by the Facility Review Group, and approved by the Plant Manager. Compliance was achieved on July 20, 1978. To help prevent recurrence of this Finding, operations personnel were notified in writing of the Technical Specification 6.8.3 and QI5 - PR/PSL-1 requirements for executing temporary changes to safety-related procedures.

Details II, paragraph 9, of the inspection report discusses the possibility that the discrepancies could have resulted in the "A" NaOH eductor being left isolated at the completion of the test.

As a result of this concern, we conducted a thorough review of OP 0420050. Based on this review, we have concluded that the NaOH eductor could not have been left isolated because procedure steps 8.1.9 (A-Train) and 8:2.9 (B-Train) require restoration of the proper eductor valve lineups at the end of the pump performance and valve operability tests.