P.O. BOX 529100, MIAMI, FL 33152

FLORIDA POWER & LIGHT COMPANY

October 16, 1979
L-79-291

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:RWZ
50-335/79-20

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

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/MAS/cph

Attachment

cc: Harold F. Reis, Esquire

ATTACHMENT

Re: RII:RWZ
50-335/79-20

Finding A

As required by Technical Specification 4.6.6.1.b, the Shield Building Ventilation System (SBVS) must be tested in accordance with ANSI N510-1975, "Testing of Nuclear Air Cleaning Systems". Sections 8 and 9 of ANSI N510 are prerequisites to Section 10 and 12, and must be completed whenever the system is modified.

Contrary to the above, the SBVS was modified by the addition of two 30 kilowatt heaters in April through June 1978. The prerequisite tests of Section 9 of ANSI N510 have not been performed although they are required.

Response A

As a result of the finding, we have performed a complete test of the Shield Building Ventilation System (SBVS). In addition to the Surveillance Requirements of Technical Specification 4.6.6.1, the test included the "prerequisite" cited in the finding. The testing was performed on August 27, 1979, and demonstrated that the plant is still in compliance with the Specification. The additional testing was performed to eliminate any question regarding the operability of the SBVS, and does not constitute concurrence with the finding. All test data are available for review at the plant site.

Based on the following information, we request that the finding be re-classified as an open-item that has been resolved by additional testing:

(1) The finding does not represent a direct violation of a Technical Specification. Rather, it is written against a "prerequisite" to a test procedure in ANSI N510-1975, which is referenced in Specification 4.6.6.1 as the method of performing various surveillances. Thus, the finding is based on a "third-tier" reference that should not have the same weight as a Technical Specification.

(2) During the original post-modification surveillance, all Specification 4.6.6.1 surveillance data had been properly acquired, compared against allowable limits, and found to be satisfactory.

(3) The "prerequisite" in question is intended to re-verify the adequacy of the injection and upstream sample points for the challenging agent (freon DOP) used for penetration testing. At the time of the original post-modification testing, we made a determination, which was supported by our testing contractor, that such re-verification was not necessary because the nature of the modification (heater

installation) could not have adversely affected or invalidated previous penetration tests. The determination was based on the fact that a perforated metal diffuser plate is located immediately upstream of the new heater elements to ensure uniform flow across the elements. Since the filter assemblies are located downstream of the heaters, the diffuser plate also improves mixing and uniformity of flow into the filters. (A letter supporting our determination has been received from the testing contractor and is available for review at the plant site.)

(4) Additional testing after the I&E inspection showed that mixing had in fact been improved, thereby confirming that it was correct to have deleted such testing after the heater installation.

Finding B

As required by 10 CFR 71.12.b.1.ii, a person using a certified cask must comply with all the conditions of the license. Condition 6 of Certificate of Compliance number USA/9094/A requires that "shoring shall be placed between secondary containers...and the cask cavity to prevent movement during normal conditions of transport". Condition 6 of Certificate of Compliance number USA/9111/A requires that "shoring shall be provided in the shipping cask cavity sufficient to prevent significant movement of the packaging under normal conditions of transport".

Contrary to the above, on March 24, 1979 and April 14, 1979, shipment 79-1 and 79-4, using USA/9094/A and USA/9111/A, respectively, left the site with neither the need nor presence of shoring determined.

Response B

We recognize the importance of this item and will ensure compliance in the future. In addition, procedures and controls regarding shipping will be revised in connection with IE Bulletin 79-19. This action is expected to be completed by approximately December 31, 1979.

Finding C

As required by 10 CFR 71.4.q, no more than 50 millicuries of group II material can be shipped in a Type A shipping cask.

Contrary to the above, on May 30, 1979, shipment 79-11 contained one container marked M.F.P. (defined in Appendix C to 10 CFR 71 as group II material) containing 209 millicuries of activity.

Response C

The response to this item is identical to Response B.