

June 12, 1980
L-80-182

Mr. James P. O'Reilly, 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:GAB
50-335/80-07

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
Advanced Systems & Technology

REU/MAS/cph

Attachment

cc: Harold F. Reis, Esquire

OFFICIAL COPY

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RESPONSE TO USNRC I&E INSPECTION REPORT 80-07

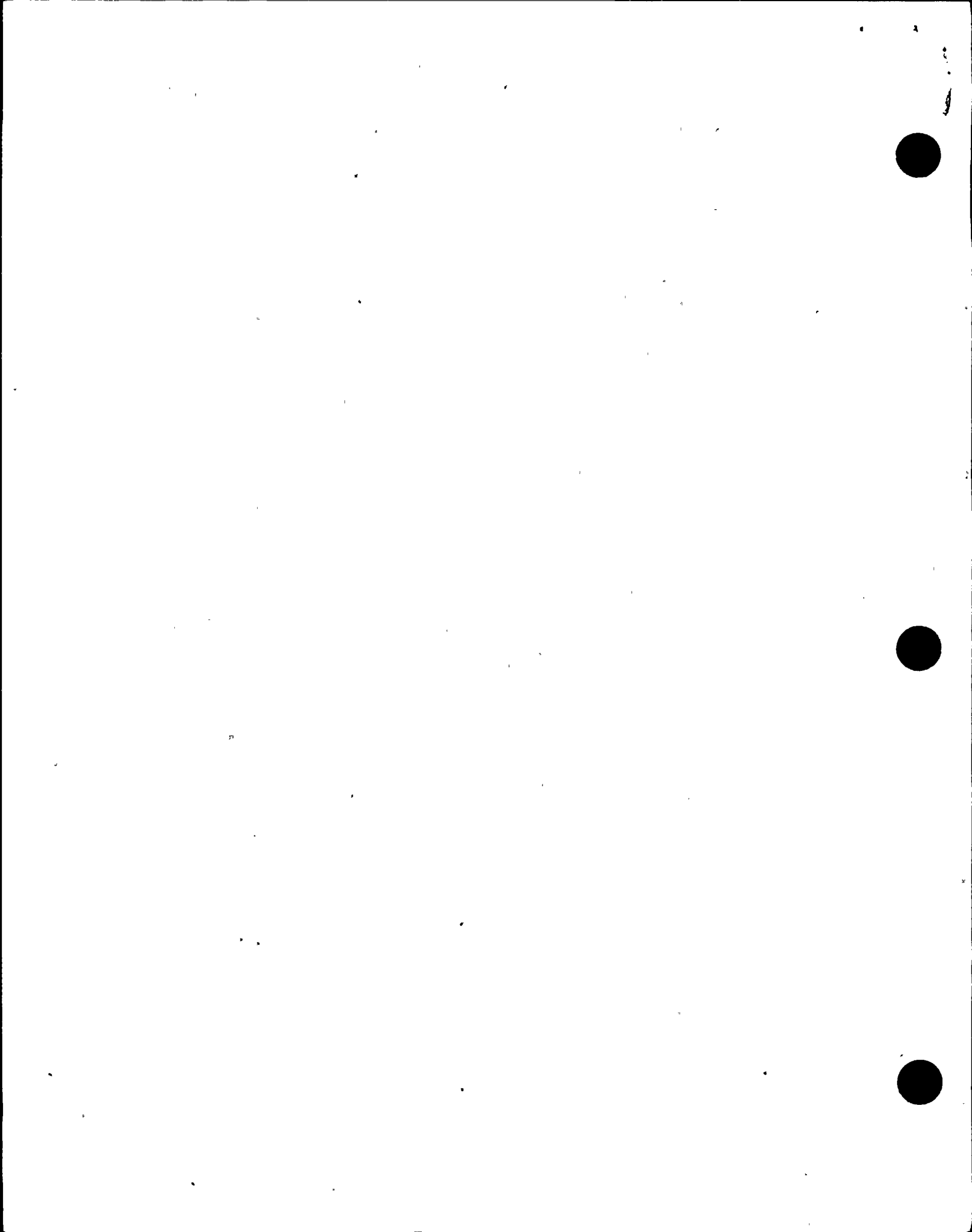
Item A

Finding: As required by Technical Specification 6.8.1. written procedures shall be established, implemented and maintained...A.P. 0010124, Control and Use of Jumpers and Disconnected Leads with Safety-Related Systems, Revision 5, dated March 2, 1979, Section 5.4, requires in part that the I & C Supervisor and the Assistant Superintendent Electrical Maintenance are responsible for reviewing, with the Operations Supervisor, the Disconnected Lead and Temporary Jumper Log...prior to...each refueling.

Contrary to the above, as of April 15, 1980, the Disconnected Lead and Temporary Jumper Log had not been reviewed as required by cognizant personnel prior to refueling activities which commenced on March 15, 1980.

Response: The responsible supervisors completed the required reviews prior to May 6, 1980. The post refueling reviews have also been conducted. Procedure changes will be issued prior to July 15, 1980 to require signatures for these reviews to preclude oversight in the future.

We have compared the classification of this finding with AEC guidance dated December 31, 1974, and request that it be downgraded to a deficiency. This request is based on our determination that (1) the finding presents no threat to the health and safety of the public, (2) reviews were being conducted by other supervisors, (3) the additional review will supplement other proper approvals, and (4) the additional review is an administrative function to provide department supervisors information for determining work during the refueling and restoration following refueling.



RESPONSE TO USNRC I&E INSPECTION REPORT 80-07

Item B

Finding: As required by 10 CFR 50, Appendix B, Criterion V, activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures. The licensee's accepted Quality Assurance Program (FPLTQAR 1-76A), Section 5.1, requires that activities affecting quality be prescribed by documented procedures and shall be accomplished in accordance with those procedures. Section 18.2.5 of FPLTQAR 1-76A requires the audited organization to provide a written response within 30 calendar days after receipt of an audit report. Quality Procedure QP-18.1, Section 5.5.1 states that responses to audit findings are due within 30 calendar days after receipt of the audit report. Quality Procedure QP-16.1, Sections 5.4.3 and 5.4.4 state the actions to be taken when no response is received.

Contrary to the above, the response to Finding #3 of audit QAE-QAD-80-1 that was issued on February 20, 1980 had not been prepared as of April 15, 1980, and none of the followup actions specified in QP-16.1 had been initiated.

Response: As stated in your cover letter the immediate corrective action was performed and verified by your inspector prior to completion of the inspection; therefore, the action described below will only address long term corrective action.

A review was made of Quality Procedure QP 16.1 that describes actions to be taken when no response is received and we have determined that the procedure is adequate. We have also made a review of all open audit items and determined this to be an isolated case. A review has been made of the intent and details of the procedural requirements with the individuals concerned to ensure a complete understanding of actions to be taken when no response is received. This review should prevent recurrence of the item.

