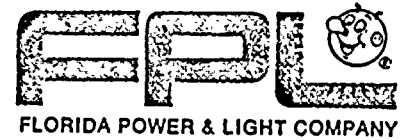


USNRC REGION II
ATLANTA, GEORGIA



30 SEP 2 11:34

August 27, 1980
L-80-281

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: WHM
50-335/80-21

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/PLP/md

Attachment

cc: Harold F. Reis, Esquire

8010030081

OFFICIAL COPY

PEOPLE...SERVING PEOPLE

ATTACHMENT

Re: RII: WHM
50-335/80-21

FINDING

As required by Section 6.8.1 and 6.8.2 of the Technical Specifications, written procedures are required to be established, implemented and maintained covering the following: applicable procedures recommended in Appendix A of Regulatory Guide 1.33; surveillance and test activities of safety related equipment; and, fire protection program implementation. These written procedures are required to be reviewed by the Facility Review Group and approved by the Plant Manager.

Contrary to the above, the surveillance inspections of the fire protection hose stations within safety related areas required by the Technical Specifications are accomplished under a maintenance inspection and work instruction which has not been reviewed by the Facility Review Group and approved by the Plant Manager. Also, the existing maintenance instruction is inadequate in that sufficient detail inspection and acceptance criteria is not provided to assure high quality inspections are accomplished.

RESPONSE

PSL had previously considered these instructions to be maintenance instructions as outlined in Reg. Guide 1.33 Paragraph I. This paragraph discusses activities not requiring detail step by step procedures when such activities are within the skills of a qualified mechanic.

PSL has revised this instruction to include additional inspection requirements. This instruction will be reviewed by the Facility Review Group and approved by the Plant Manager prior to September 1, 1980. This instruction will be in effect by October 1, 1980.



FINDING

Florida Power and Light (FP&L) Company's letter L-78-280 from R.E. Uhrig to V. Stello, NRR dated August 28, 1978 provided a specific list of the FP&L fire protection procedures which did not adhere to the NRC guidelines entitled "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls, and Quality Assurance" dated June 14, 1977 and provided a justification for these deviations.

Contrary to the above, the following additional fire protection administrative control procedures do not meet the NRC guidelines and no exception to these guidelines were identified in FP&L's letter of August 28, 1978.

1. Procedures are not provided for the control of open flame and other possible ignition sources other than welding and cutting operations as required by Paragraph 1 of Attachment 4 of the NRC guidelines.
2. Procedures do not require the concurrence by a qualified member of the plant's management or Quality Control inspector when supervisor determines that a fire watch is not required for a welding, cutting or other "hot work" operation as required by Paragraph 2.c of Attachment 4 to the NRC guidelines.
3. Procedures do not require oxyacetylene equipment to be checked for leaks before being moved into the work area as required by Paragraph 2.b (4) of Attachment 4 to the NRC guidelines.

RESPONSE

1. Procedures were provided for "open flame" work, however, these instructions did not specifically state "cutting" or "grinding". The subject procedures will be changed to include the required concerns.
2. Procedures will be changed to require QC concurrence when performing hot work in areas containing or effecting safety related equipment.
3. Procedures will be changed to require oxyacetylene equipment to be checked for leaks before being moved to the work area.

The above procedure changes will be issued by September 1, 1980.

