

March 12, 1981
L-81-112

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

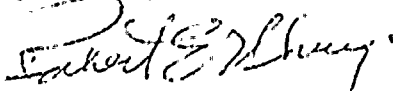
Dear Mr. O'Reilly:

Re: RII:JPO
50-335/80-38

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

JEM/mbd

Attachment

cc: Harold F. Reis, Esquire

810.4200445



ATTACHMENT

Finding A:

Technical Specification 6.8.1(a) requires that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.

Contrary to the above, Operating Procedure 0010122 In-Plant Clearance Orders was not implemented in that on December 10, 1980 equipment tags for clearances 12-033 and 12-034 were found not signed by the person hanging the tag and some tags were found affixed to the wrong valves.

Response A:

1. FPL concurs with the finding.
2. The finding is attributed to inattention to job detail.
3. The clearance tags were properly affixed and signed on 12/10/80.
4. To preclude future occurrences of this type, double verification of tags and clearances for equipment covered by the Technical Specifications has been implemented according to OP 0010122.
5. Full compliance achieved on 1/30/81.

Finding B:

Technical Specification 6.8.1.(a) requires that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in appendix "A" of Regulatory Guide 1.33, November, 1972.

Contrary to the above, procedures were not maintained in that:

1. Off Normal Operating Procedure 0030131 Revision 11, Plant Annunciator Summary approved December 9, 1980 contained over eighty title discrepancies, other than minor typographical errors, when compared to the installed plant annunciators. Also, the procedure alarm setpoints for Safety Injection Tank levels were considerably different from actual alarm setpoints. Cases existed where title changes/additions would require action statement changes that were not made.
2. Maintenance Procedure MP 0110060, Periodic Maintenance of Control Element Assembly (CEA) Drive Equipment and Switchgear Revision 6 approved September 29, 1980 (and also a draft revision under consideration) did not address lock wiring of Trip Circuit Breaker undervoltage trip settings and omitted maintenance of shunt trip devices.

Response B:

1. FPL concurs with the finding.

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2. The procedure was overlooked by affecting modifications and set point changes in the early days of operation.
3. The procedure has been reviewed for immediate potential problems.
4. The procedure will be revised to reflect the correct annunciator nomenclature and set point values. The present PCM program requires a review of all affected procedures and drawings.
5. Compliance will be achieved by 4/30/81.

FPL has the following additional comments on this item.

Review of the NRC audit on annunciator wording has revealed several types of discrepancies.* The RTGB and switchyard line repeat panel discrepancies will be treated separately. A breakdown of categories and the number of discrepancies in each follows:

1. Nomenclature or Editorial Discrepancies: 9
This type of discrepancy involved transposition of words (i.e. Hi Radiation vs. Radiation Hi), clarification additions to Control Room windows (i.e. adding 1 gpm to RX Cavity leakage window), and substitution of words of similar meaning (i.e. SWGR vs BUS).
2. CWD's not yet updated to reflect changes due to PCM's installed: 17
The control room window reflects actual plant installation and CWD's are stamped to indicate changes are required.
3. CWD's not updated to reflect PCM: 5
CWD not updated to reflect PCM changes nor were they stamped to indicate such changes were needed.
4. CWD's which have been updated since inspection: 2
5. CWD drafting error: 1
6. Window label did not reflect the changes which are taking place or have taken place due to PCM's: 6

For items 1-5 above, the annunciator windows are correct in that they do reflect nominal plant installation. This drawing control problem is currently unresolved item 50-335/80-38-06 and will be addressed promptly.

In Item 6, three incompletd windows are for systems/components not yet completed or functional. They will be changed. The other three windows are partially incorrect but do not involve an item of any safety significance and will be corrected by 4/13/81 on an interim basis. Permanent correction will follow. None of the above items would cause an operator to make an incorrect response to an alarming conditions.

The non safety related switchyard line repeat panel windows in all cases were discrepancies which involved inconsistent labeling techniques or nomenclature problems. Typical discrepancies listed below:

* Of the total 866 active windows 65 discrepancies were noted by PSL.



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1. Omission of "OCB" on some windows.
2. Complete breaker numbers not listed on all windows.
3. Transposition of FW/NW trip vs trip FW/NW.
4. Abbreviations DIFF L/P vs Differential L/P.
5. St. Lucie Line vs. Midway Line.

Total windows involved: 25

A consistent means of labeling the line repeat panel has been devised and will be implemented in the near future.

It should be pointed out that no discrepancy noted would cause an operator to make an incorrect response to an alarming condition.

B.2 Finding: Maintenance Procedure MP 0110060, Periodic Maintenance of Control Element Assembly (CEA) Drive Equipment and Switchgear Revision 6 approved September 29, 1980 (and also a draft revision under consideration) did not address lock wiring of Trip Circuit Breaker undervoltage trip settings and omitted maintenance of shunt trip devices.

- B.2 Response:
1. FPL does not fully agree with this finding.
 2. The subject procedure was changed as a result of I&E Bulletin 79-09. At that time, the adjustment of the undervoltage device was not included in this procedure. Testing of the setpoint was included as were additional mechanical checks. Because adjustment was not included, lock wiring would not have been addressed. Following the problem of the undervoltage device again in 1980 (LER-80-67) the entire testing frequency and maintenance aspects were reviewed. As a result of this review, changes were made in the entire breaker maintenance program. Discussions were conducted with the NRC Resident Inspector regarding this breaker problem. Each of the procedure areas were discussed at great length to ensure adequate resolution of the NRC Resident Inspector's input.
 3. The subject procedure has been reviewed by the FRG.
 4. At the time the procedure was considered adequate for technical content. PSL considers this item as part of the ongoing review and updating for specific problems.
 5. Full compliance will be achieved 3/19/81.

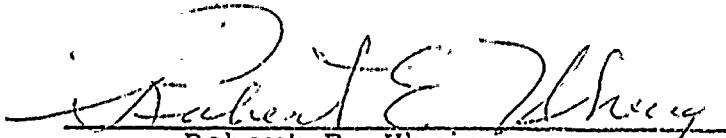


STATE OF FLORIDA)
) SS
COUNTY OF DADE)

Robert E. Uhrig, being first duly sworn, deposes and says:

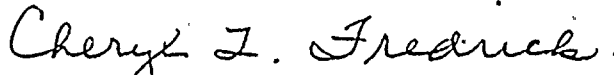
That he is a Vice President of Florida Power & Light Company,
the Applicant herein:

That he has executed the foregoing document; that the statements
made in this said document are true and correct to the best of
his knowledge, information and belief, and that he is authorized
to execute the document on behalf of said Applicant.


Robert E. Uhrig

Subscribed and sworn to before me

this 12th day of March, 1981



NOTARY PUBLIC, in and for the County of Dade,
State of Florida

My commission expires: 