UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

November 16, 1979

Docket Nos. 50-250
50-251

LICENSEE: Florida Power and Light Company

FACILITY: Turkey Point Units Nos. 1 and 2

SUBJECT: SUMMARY OF NOVEMBER 14, 1979 PHONE CONVERSATION REGARDING LESSONS LEARNED IMPLEMENTATION

During a phone conversation on November 14, 1979 the NRC Lessons Learned Implementation Team discussed with the licensee, its October 22, 1979 response to our September 13, 1979 letter.

The team informed the licensee of those lessons learned items for which the licensee's proposed schedule for implementation is unacceptable. These items along with the proposed and required completion dates are listed in Enclosure 1.

The team informed the licensee of those items for which the proposed action does not appear to comply with the lessons learned requirement. These items and their associated deficiencies are listed in Enclosure 2.

The team also informed the licensee of those items for which further clarificatior of the licensee's commitment is necessary to demonstrate compliatnce with the lessons learned requirements. These items and the associated team questions are listed in Enclosure 3.

Items 2.1.3.b (Instrumentation for Detection of Inadequate Core Cooling) (Procedures Only), 2.1.7.a (AFW Initiation), 2.1.7.b (AFW Flow), and 2.1.9 (Accident and Transient Analysis) were not discussed since these items are being implemented by the Bulletins and Orders Task Force.

By letter dated October 30, 1979 we provided additional clarification of the lessons learned requirements to all licensees. We also requested that within 15 days licensee's justify proposed actions not in complete agreement with the staff's requirements and improve the implementation schedule where it differed from the staff's requirements. During this phone conversation we informed the licensee that those items listed in Enclosures 1 and 2 should be addressed in their response. In addition, the licensee agreed to provide the information requested in Enclosure 3 in its response to our October 30, 1979 letter or as soon thereafter as possible.

M. Grotenhuis, Project Manager
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Division of Operating Reactors

Enclosures (3):
As Stated

cc w/enclosures: see next page

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Docket Files
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NRR Reading
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ENCLOSURE 1

Turkey Point 3 and 4

Items Do Not Meet Schedule

1. Section 2.1.3(a) Direct Indication of Valve Position

   FPL states its intention to comply with this requirement during scheduled outages, The staff's required date for completion of this item is January 1980.

2. Section 2.1.3(b) Instrumentation for Inadequate Core Cooling (Subcooling Meter)

   FPL is generally responsive but doesn't commit to a schedule. The implementation date is January 1, 1980.

3. Section 2.1.6.a Systems Integrity

   FPL should, by January 1, 1980, provide a summary description of the program and leak rate measurements on existing systems. The program must include regular testing.

4. Section 2.1.6.b Shield Review

   The design review and identification of needed modifications shall be completed by January 1, 1980 and the modifications are to be made by January 1, 1981 (Category B).

5. Section 2.1.8.a Post-Accident Sampling

   By January 1, 1980, FPL should have completed the design reviews, the procedure revision and the description of modifications. By January 1, 1981 the modifications should be made.

6. Section 2.1.8.b High Range Radiation Monitoring

   By January 1, 1980 procedures must be provided for estimating releases if instruments are off-scale. Also, the effluent monitors shall include high range radioiodine and particulate systems. The instruments must be installed by January 1, 1981 (Category B).

7. Section 2.1.8.c Improved Radioiodine Instrumentation

   The January 1, 1980 implementation date is a requirement.

8. Section 2.2.2.6 Onsite Technical Support Center

   FPL should provide a commitment to complete the permanent Onsite Technical Support Center by January 1, 1981.

9. Section 2.1.5.a Dedicated Hydrogen Control Penetrations

   Any modifications to the dedicated hydrogen control penetrations at Turkey Point should be completed by the required date of January 1, 1981.

10. Containment Pressure, Containment Water Level, Containment Hydrogen Indication

The instrumentation required to monitor containment pressure, water level, and hydrogen concentration should be installed by the required date of January 1, 1981.

ENCLOSURE 2

Turkey Point 3 and 4

Proposed Action Does Not Appear To Comply With Lessons Learned Requirements

1. Section 2.2.1(b) Shift Technical Advisor (STA)

FPL states its intent to have the STA on-call at all times and capable of responding within 45 minutes. Our position is that the STA be on shift and available in the control room within 10 minutes.

FPL further states that it may elect to designate a qualified member of the operating shift to perform the accident/transient function. This would be acceptable at least on an interim basis if this person has no other duties once he is designated as Shift Technical Advisor.

ENCLOSURE 3

Turkey Point 3 and 4

Clarification of Licensee's Position is Needed to Verify Compliance

1. Section 2.1.1 Emergency Power Supply Requirements for Pressurizer HTRS Power Operated Relief Valves and Block Valves and Pressurizer Level Indications in PWRs

   The FPL response to this section did not address the specifics of the sub-parts of the position as described in NUREG-0578. Clarification is required.

2. Section 2.1.8.a Post Accident Sampling

   Capability to analyze samples in a timely manner ($\leq$2 hr) is a requirement. Off-site analysis of samples is not acceptable. Analysis capability must include B and Cl.

   Analysis capability must include hydrogen concentration in the containment atmosphere and dissolved gases in the reactor coolant.

3. Section 2.2.2.B Onsite Technical Support Center

   FPL response to this section did not address the specifics of the position as described in NUREG-0578. Clarification is required.

   Address the requirement of radiation monitoring for the onsite technical support center as identified under clarification letter of October 30, 1979.

4. Section 2.2.2.C Onsite Operational Support Center

   FPL response to this section did not address the specifics of the positions as described in NUREG-0578. Clarification is required.

5. Section 2.1.4 Containment Isolation Provisions

   A list of all essential and non-essential systems should be provided along with the basis for the classification of essential systems. Any required modifications should be completed by January 1, 1980.