



May 9, 1980
L-80-149

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:RVL
50-250/80-10
50-251/80-10

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/pa

Attachment

cc: Harold F. Reis, Esquire

OFFICIAL COPY

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ATTACHMENT

RESPONSE TO USNRC INSPECTION REPORT 80-10

Finding:

As required by Section 6.8.1 of the Technical Specifications, written procedures and administrative policies that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of the USNRC Regulatory Guide 1.33 shall be implemented.

Contrary to the above, the following two examples represent a failure to implement existing procedures:

EXAMPLE (1):

On February 25, 1980, Operations personnel were unable to confirm that the Pressurizer Relief Tank (PRT) level was maintained at the limit specified by Step 8.2.5 of Operating Procedure 1300.1, Pressurizer Relief Tank, on account of this reduction of PRT level being conducted in the absence and unawareness of the existence of the aforementioned procedure.

Response (1):

One of the causes of this example was that the allowable range of PRT levels as indicated on the Control Room level indicator did not agree with the allowable range indicated in the procedure. The Control Room operator assumed the band indicated in the Control Room was consistent with the procedure. As immediate corrective action the day after the noncompliance, a temporary change was made to the procedure to make it consistent with the Control Room allowable level band. In order to prevent recurrence, on May 2, 1980, a permanent change to the procedure was reviewed by the Plant Nuclear Safety Committee, which, combined with relabeling the Control Room level indicator, resulted in the procedure and the level indicator both being in agreement.

Another cause of this noncompliance was the unfamiliarity of the operators with Operating Procedure 1300.1. During the course of the discussions at the time of the non-compliance, these specific operators became familiar with the procedure. In order to prevent recurrence, the newly revised procedure will be revised after it is issued by all licensed operators (pursuant to the licensed operator requalification program).

EXAMPLE (2):

On February 4, 1980, at 11:40 p.m., Unit 3 was tripped due to the failure to follow the procedural steps of Operating Procedure 1004.2, Reactor Protection Systems - Periodic Test, which required the closing of the reactor trip bypass breakers prior to the opening of the reactor trip breakers.

Response (2):

In order to prevent recurrence, the following actions have been or will be taken:

Operating Procedure 1004.2 has been reviewed and procedural changes were discussed and will be implemented to indicate the locations or stations to be manned when needed to perform the test, and to require that communications be established between these stations when needed to do the test. Plant Nuclear Safety Committee review and Plant Manager - Nuclear approval of the procedure change will be completed prior to June 2, 1980.

Preventative Maintenance will be performed on the critical portions of the plant communications systems twice each year. The first preventative maintenance check of the critical portions has been initiated and will be completed once per year. The first section is now intended to be the normal, routine preventative maintenance of the plant communication system. The second section is now intended to be the newly developed critical plant communications preventative maintenance module.

Full compliance will be achieved on or before June 10, 1980.



Finding:

As indicated in paragraph 5 of IE Inspection Report 50-250/79-24 and 50-251/79-24, a commitment was made to have available by October 1979, for use in final approved form, procedures covering the following:

- o Auxiliary Feedwater Pump Turbine Overhaul
- o Auxiliary Feedwater Pump Turbine Throttle Trip Valve Overhaul
- o Auxiliary Feedwater Pump Overhaul and Maintenance

Contrary to the above, such procedures had not been made available for use in final approved form as of February 28, 1980.

Response:

Although the procedures listed were in final typed form and awaiting Plant Nuclear Safety Committee review and Plant Manager-Nuclear approval at the time of the inspection they were not in our commitment tracking system. On February 29, 1980, the day after we became aware of the situation, the procedures were reviewed by the Plant Nuclear Safety Committee and have subsequently been approved and issued.

To investigate this deviation, discussions were held with the individual who had been responsible for tracking commitments to the NRC. It was learned that before these discussions it had been his practice to review only the notice of violation and the notice of deviation sections and not the details section of I & E Inspection Reports. This practice caused him to be unaware of the commitment because it appeared in the details section of the report.

To prevent recurrence, all sections of the I & E inspection reports will be reviewed to ensure that all commitments are noted and met. In addition, we reviewed all I & E Inspection Reports back to August 1979 in order to determine if any other commitments listed in the details sections had been missed. It was determined that all such commitments had been met.

Full compliance was achieved on March 6, 1980.