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February 24, 1981  
L-81-63

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: Turkey Point Units 3 & 4  
Docket Nos. 50-250, 50-251  
Inspection Report Nos. 80-36 and 80-34

Florida Power & Light Company has reviewed the subject inspection reports and a response is attached.

There is no proprietary information in the report.

Very truly yours,

*E. L. Edomat*

*for* Robert E. Uhrig  
Vice President  
Advanced Systems and Technology

REU/PLP/ras

Attachment

cc: Harold F. Reis, Esquire

8103190294



ATTACHMENT

RE: Turkey Point Units 3 & 4  
Docket Nos. 50-250, 50-251  
Inspection Report Nos. 80-36 and 80-34

Finding:

Technical Specification 6.8.1 requires implementation of written procedures and administrative policies that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI 18.7 - 1972 and USNRC Regulatory Guide 1.33.

Procedure 0103.11 requires that following maintenance, safety related systems are restored to their normal condition.

Contrary to the above, during facility tours of Units 3 and 4 this inspection period, it was noted that maintenance supervisors failed to implement existing procedures to ensure complete restoration of safety related systems to normal operating condition following maintenance in that:

1. The Mechanical Supervisor on shift during the completion of maintenance on Unit 4 blender station failed to have the pipe support between manual isolation valve 4363 and flow control valve 4114A made up and the wooden wedges providing temporary support removed at conclusion of maintenance activity.
2. The Mechanical Supervisor on shift during the completion of maintenance on the Unit 3 Boron Injection Tank failed to have the insulation over the manway cover properly replaced at the conclusion of the maintenance activity.
3. Electrical Supervisors allowed the spray tight covers for all heat tracing thermostats to be left off as a routine practice instead of properly positioned at the conclusion of maintenance activities.

Response:

1. (1-1) FPL concurs with the finding.
  - (1-2) This particular pipe support was either inadvertently omitted due to lack of follow-up or was still in the process of being repaired at the time this finding was noticed. This was found during the hanger and pipe support inspections and repairs pursuant to I and E Bulletin 79-79-02 which were in progress when Unit 4 was in cold shutdown condition for its annual overhaul/refueling.
  - (1-3) As corrective action, the pipe support in question was returned to its original configuration in December 1980.
  - (1-4) As corrective action in order to avoid further problems, a procedure is being developed to control removal, reinstallation, and maintenance of hangers and pipe supports by plant maintenance forces in order to:
    - a) Prevent recurrence of the same type of problem.
    - b) Provide guidelines for returning hangers and/or pipe supports to their original configuration after their removal for maintenance



c) Provide guidelines on the specifications for each type of bolt on each hangers (i.e., torquing of bolts)

(1-5) This procedure is now being formulated. It is being actively pursued and it is scheduled to be reviewed and approved by April 27, 1981. Full compliance will be achieved when it is approved.

2. (2-1) FPL concurs with the finding.

(2-2) The insulation on the Unit 3 Boron Injection Tank manway cover was not reinstalled after maintenance due to lack of follow-up.

(2-3) As corrective action, the insulation on the manway cover in question was reinstalled prior to January 1981.

(2-4) As corrective action to avoid further problems, we are taking the following steps:

A specific crew will be designated to maintain each nuclear unit's primary systems. The supervisor in charge of each crew will be responsible for compliance with applicable plant procedures (including AP 0103.11) and following up after his crew completes each job. This responsibility will be implemented by instructing personnel and disseminating job descriptions. One of the two crews assigned to primary systems will be responsible for housekeeping.

(2-5) Full compliance will be achieved no later than March 27, 1981.

3. (3-1) FPL concurs with the finding.

(3-2) The practice in the finding developed gradually following several instances of varying degrees of solidification in boric acid systems requiring heat tracing. The Electrical Maintenance Department initiated weekly checks of each heat tracing circuit to verify proper circuit operation. Many minor adjustments and repairs were made as a result of these checks. Most of these adjustments and repairs required access to the heat tracing thermostat boxes. The practice of not replacing the covers evolved due to the awareness that the cover being reinstalled would probably be removed again with a week. Also, this practice allowed the shift operators to make minor thermostat adjustments to a circuit during times when Electrical personnel were not available.

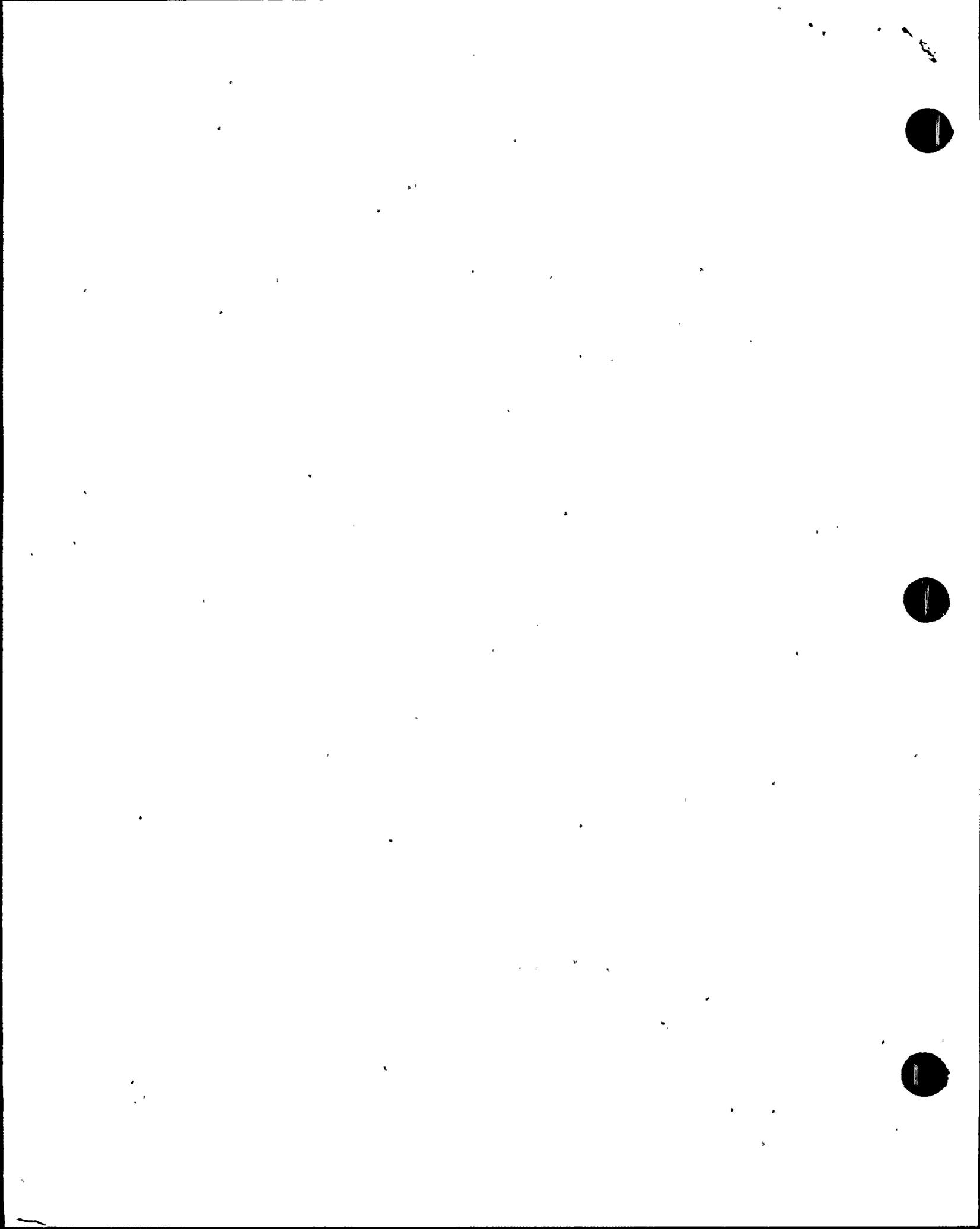
(3-3) In order to improve the reliability and performance of the heat tracing circuits, the originally installed Chromalox type heat tracing circuits are being replaced with a much improved Chemelex type. The replacement program is planned to continue until all heat tracing circuits are replaced. The new type of heat tracing has already proven to be more reliable and to require far less maintenance. Consequently, for the new circuits there is no need to leave the covers off.



(3-4) Corrective action that will be taken;

- a) Installation of covers which are now available.
- b) The installation of necessary replacement covers which have been ordered.
- c) Meetings within the Electrical Department will be held to stress the importance of the re-installation of these covers.
- d) Preventive Maintenance Program plant work orders will be revised to include a specific step calling for installation of the covers following the work.

(3-5) Full compliance is scheduled to be completed by May 15, 1981.



STATE OF FLORIDA     )  
                              )  
COUNTY OF DADE     )     ss.

E. A. Adomat, being first duly sworn, deposes and says:

That he is Executive Vice President of Florida Power & Light Company, the Licensee 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



E. A. Adomat

Subscribed and sworn to before me this

24 day of February, 1981

Cheryl J. Fredrick

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

Notary Public, State of Florida at Largo  
My Commission Expires October 30, 1983

My commission expires: Sended thru Mowhard Bonding Agency

