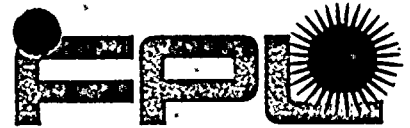


USNRC REGION II  
ATLANTA, GEORGIA



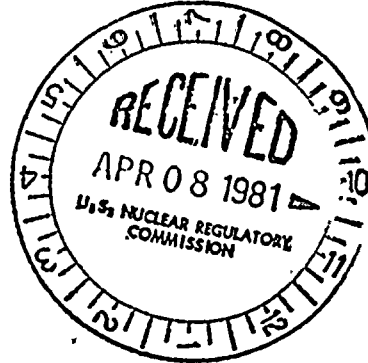
FLORIDA POWER & LIGHT COMPANY

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March 31, 1981  
L-81-138

*Central File*

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  
50-250, 50-251  
IE Bulletin 80-20, Rev. 1

Our response to the subject Bulletin for applicability to Turkey Point Units 3 & 4 was forwarded by letter dated September 16, 1980, (L-80-307). Based on discussions with R. C. Lewis (USNRC - I&E Region II), a revised response is attached and replaces our previous response in toto.

Approximately 145 man-hours have been expended thus far in responding to the first two action items in the Bulletin.

Very truly yours,

*Robert E. Uhrig*  
*or*

Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/WAK/at

Attachment

cc: Mr. Harold F. Reis, Esquire  
Director, Division of Reactor Operations Inspection

810.4130/67

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Item 1

Determine whether Westinghouse Type W-2 control switches with spring return to neutral position are used in safety-related applications at your facility. If so, identify the safety-related systems using these switches and the total number of switches so used. If no such switches are used in your facility, you should indicate that this is the case and ignore the remaining questions.

Response 1

Component

- A Component Cooling Water pump
- B Component Cooling Water pump
- C Component Cooling Water pump
- A Safety Injection pump
- B Safety Injection pump
- C Safety Injection pump
- D Safety Injection pump
- A Residual Heat Removal pump
- B Residual Heat Removal pump
- A Containment Spray pump
- B Containment Spray pump
- A Intake Cooling Water pump
- B Intake Cooling Water pump
- C Intake Cooling Water pump
- A Startup Transformer Breaker
- B Startup Transformer Breaker
- A Load Center Feeder Breaker
- B Load Center Feeder Breaker
- C Load Center Feeder Breaker
- D Load Center Feeder Breaker
- Emergency Startup Transfer Breaker

Total Number of Switches:

Unit No. 3 . . . . . 21

Unit No. 4 . . . . . 21

Item 2

Licensees of operating plants using Type W-2 spring return to neutral control switches in safety-related applications shall perform continuity tests on all such switches. These tests shall be performed with the switch operator in the neutral position and completed within ten (10) days of the date of this bulletin. In addition, this continuity test shall be repeated at least every thirty-one (31) days after the initial test and after each manipulation of the switch from its neutral position. These continuity tests may be discontinued subsequent to implementing longer term corrective measures...

Response 2

Continuity tests were performed on all the switches listed in Response 1 within ten (10) days of the date of the bulletin. The results of the continuity tests on all switches were successful..

Florida Power & Light Company (FPL) committed to repeat the continuity test at least every ninety-two (92) days after the initial test. Based on discussions with R. C. Lewis (USNRC - I & E Region II) on February 12, 1981, the continuity test schedule has been revised to repeat at least every sixty (60) days on a staggered basis, i.e., Unit No. 3 in one month and Unit No. 4 in the subsequent month, however, continuity tests after each manipulation of the switch from its neutral position would not be required. These continuity tests may be discontinued subsequent to implementing longer term corrective action. The basis for the frequency of continuity testing is that the switches have continued to perform successfully since the initial criticality for both Unit No. 3 and Unit No. 4, October 20, 1972, and June 11, 1973, respectively.

Item 3

Licenseses of operating plants and holders of construction permits shall describe the longer term corrective measures planned and the date by which such measures will be implemented by actual installation or by design change, as appropriate. As a minimum, the longer term corrective measures should include rewiring the indicating light as shown in Figure 1 provided the light is readily visible to the control room operator. If not, failures of the neutral position contacts should be annunciated in the control room.

Response 3

The development of longer term measures was referred to our engineering department. The evaluation has been completed. FPL plans to replace the W-2 switches identified in the response to Item 1 with qualified replacement switches. The new switches will employ wiping contacts which should preclude problems associated with contaminated contacts not "making up". The implementation schedule is tentatively set for July 1981, for Unit No. 4 and September 1981, for Unit No. 3, however, this schedule is contingent upon receipt of the new switches. Continuity testing will be continued at the frequency described in the response to Item 2 until the modifications can be completed.