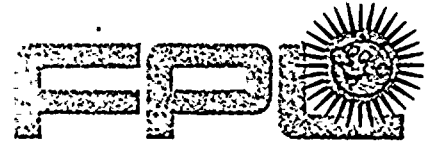


USNRC REGION II
ATLANTA, GEORGIA

81 MAY 6 P 3: 09



FLORIDA POWER & LIGHT COMPANY

April 30, 1981
L-81-187

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
IE Inspection Report 81-02

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/PLP/mbd

Attachment

cc: Harold F. Reis, Esquire

8106080344

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ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250, 50-251
IE Inspection Report 81-02

FINDING A:

Technical Specification 6.8 requires written procedures for safety related equipment maintenance. Licensee administrative procedure 0190.19, Control of Maintenance on Nuclear Safety Related Systems, require plant work orders (PWO's) to be sufficiently detailed to accomplish work safety.

Contrary to the above, on January 3 and 6, 1981, PWO's 7922 and 8972 were not sufficiently detailed for work on safety related systems in that: The subject PWO's failed to identify concurrent maintenance and actual operating conditions. PWO 7922 did not identify the specific use of inputting test signals and PWO 8972 failed to reference the appropriate off-normal operating procedure for restoring the Safeguard racks to their normal operating condition. Work conducted under both of these PWO's caused inadvertent Engineered Safety Feature actuations.

RESPONSE:

- (A-1) FPL concurs with the finding.
- (A-2) The reason that the PWOs were not specific enough to identify concurrent maintenance and actual operating conditions is that the PWOs were maintenance instructions which were written prior to the outage for use during routine outage conditions. The PWOs were maintenance instructions 74-003 and 74-005.
- (A-3) As corrective action, our Instrumentation and Controls Department conducted an investigation into the inadvertent safety injection signals. Reviews were conducted with the supervisors and workers into the causes and precautions that must be taken to avoid recurrence. Applicable maintenance procedures and maintenance instructions (PWOs) were reviewed, in conjunction with the investigation.
- (A-4) As corrective action to avoid further problems, the two maintenance instructions (No. 74-003, Main Feedwater Valves and No. 74-005, Feedwater Bypass Valves), have been revised to caution personnel to obtain QC and Operations approval if safety injection signals are present. This caution will cause, if safety injection signals are present, additional review of the original plant work order. In addition, requests for procedure changes to Maintenance Procedures 14007.16, Steam Generator Level, Feedwater Flow and Steam Flow Instrumentation Calibration and 14007.26, Steam Line, Steam Header, and Turbine 1st Stage Pressure Instrumentation Calibration have been drafted and will be reviewed by the Plant Nuclear Safety Committee.
- (A-5) Full compliance will be achieved by June 1, 1981.



Re: Turkey Point Units 3 and 4
Docket Nos. 50-250, 50-251
IE Inspection Report 81-02

FINDING B:

Your September 16, 1980, response to IE Bulletin No. 80-20, Failure of Westinghouse Type W-2 Spring Return to Neutral Control Switches, stated in response 2 that a continuity test will be repeated on all the control switches listed at least every ninety-two (92) days after the initial test.

Contrary to the above, the continuity test was not repeated on the required switches until, more than 92 days had elapsed since the initial test. The tests were performed on November 29, 1980, after the resident inspector's identification.

RESPONSE A:

- (B-1) FPL concurs with the finding.
- (B-2) The reason for the finding is that, although we performed the required testing of these switches within the ten days of the date of the bulletin, our subsequent inspection was inadvertently not performed until after the ninety two (92) day period for follow-up testing had elapsed.
- (B-3) As corrective action, as indicated in the inspection report, the necessary testing was performed to insure that all the switches were functioning in a satisfactory manner.
- (B-4) As corrective action to avoid further problems, the testing of the switches has been added to the Electrical Department's preventative maintenance schedule. In addition, FPL submitted a supplemental response to I and E Bulletin 80-20 (our Letter L-81-138, dated March 31, 1981) which changed interval testing so that the switches for each unit will be inspected on a sixty day frequency. In addition, FPL plans to replace these switches with qualified replacements.
- (B-5) The corrective action was completed on January 7, 1981.

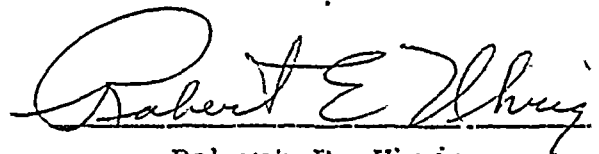


STATE OF FLORIDA)
)
) ss.
COUNTY OF DADE)

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

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


Robert E. Uhrig

Subscribed and sworn to before me this

30 day of April, 1981

Cheryl J. Fredrick
NOTARY PUBLIC, in and for the county of Dade,
State of Florida

My commission expires: Notary Public, State of Florida at LDCB
My Commission Expires October 30, 1983
Bonded thru Maxfield Bonding Agency

