USNRO REGION TATLANTA, GEORGIA

81 DEC 1 P2: 20



November 24, 1981 L-81-496

Mr. James P. O'Reilly, Director, Region II Office of Inspection and Enfocement 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 81-20

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/ras

Attachment

cc: Harold F. Reis, Esquire

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Turkey Point Units 3 & 4 Docket Nos. 50-250, 50-251 Inspection Report 81-20

## FINDING A:

Technical Specification 6.8.1 requires the establishment and implementation of written procedures for safety related activities. Administrative Procedure 0103.2, Duties and Responsibilities of Operators On-Shift and Maintenance of Operating Logs and Records, specify that technical specification time limits be entered on the Equipment Out of Service Log.

Contrary to the above, on September 9, 1981, an inadequate review to recognize that only one boric acid transfer pump was available resulted in the failure to enter Technical Specification 3.6.d.2 time limit on the Equipment Out of Service Log when one of the Unit 3 and Unit 4 boric acid transfer pumps were taken out of service.

- (1) FPL concurs with the finding.
- The operator checked that two boric acid (BA) pumps were available for operation prior to issuing a clearance to repair valves 377, 378 and 379. However the 3A BA Pump was available to Unit 3 only. The 4B BA Pump was available to Unit 4. Both pumps should have been available to Unit 4. The Unit 3 core has been unloaded and does not require a flow path from the BA system. The operator mis-interpreted the Technical Specifications and thought that since he had two Boric Acid pumps available, he was in compliance. Therefore, he entered "Not Applicable" in the Equipment Out of Service Log.
- (3) The entry was corrected and the individuals involved in the work were made aware that the system was under a Technical Specification time limit.
- (4) This action should prevent further problems.
- (5) Full compliance was achieved November 16, 1981.

## FINDING B:

Technical Specification 3.9.1.i requires that steam generators be continuously monitored while being blown down to assure that releases to the environment are within the limits specified in 10 CFR Part 20.

Contrary to the above, on August 21, 1981, Unit 4 steam generator 4A was blown down for about three minutes with its blowdown sample isolation valve FCV 4-1427 shut.

- (1) FPL concurs with the finding.
- (2) The steam generator blowdown sample isolation valve, FCV-4-1427, had been closed so maintenance could be performed on the sample system. The valve had been closed approximately two or three minutes when the error was noticed.
- (3) As corrective action, the isolation valve was opened and the individuals involved were counseled about the necessity of being aware of Technical Specification requirements when granting clearances.
- (4) This action should present further problems.
- (5) Full compliance was achieved on November 19, 1981.

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STATE OF FLORIDA COUNTY OF DADE	) ) )	ss.					
Robert E. Uhrig	, bein	g first	duly	sworn,	deposes	and	says:
That he is Light Company, th	Vice Pres e	ident here	in;	0:	f Florida	a Pow	er &
That he has executed the foregoing document; that the state- ments 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							
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		~	,	Robert	E. Uhrig	/	7

Subscribed and sworn to before me this

day of November, 1981

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

My commission expires:

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

Economission Expires October 30, 1983



## OCT 20 1981

Florida Power and Light Company
ATTN: Dr. R. E. Uhrig, Vice President
Advanced Systems and Technology
P. O. Box 529100
Miami, FL 33152

Gentlemen:

Subject: Report Nos. 50-250/81-20 and 50-251/81-20

This refers to the routine safety inspection conducted by Mr. R. Vogt-Lowell of this office on August 26 - September 25, 1981, of activities authorized by NRC Operating License Nos. DPR-31 and DPR-41 for the Turkey Point facility. Our preliminary findings were discussed with Mr. J. K. Hays, Plant Manager-Nuclear, at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

During the inspection, it was found that certain activities under your license appear to violate NRC requirements. These items and references to pertinent requirements are listed in the Notice of Violation enclosed herewith as Appendix A. Elements to be included in your response are delineated in Appendix A.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosed report will be placed in the NRC's Public Document Room. If the report contains any information that you believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you: (a) notify this office by telephone within ten days from the date of this letter of your intention to file a request for withholding; and (b) submit within twenty-five days from the date of this letter a written application to this office to withhold such information. If your receipt of this letter has been delayed such that less than seven days are available for your review, please notify this office promptly so that a new due date may be established. Consistent with section 2.790(b)(1), such application must be accompanied by an affidavit executed by the owner of the information which identifies the document or part thereof sought to be withheld, and a full statement of the reasons on the basis of which it is claimed that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, the report will be placed in the Public Document Room.

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Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

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Paul J. Kellogg, Chief Projects Branch 2, Division of Resident and Reactor Project Inspection

## Enclosures:

1. Appendix A, Notice of Violation

 Inspection Report Nos. 50-250/81-20 and 50-251/81-20

cc w/encl:

H. E. Yeager, Site Manager

bcc w/encl: NRC Resident Inspector Document Management Branch State of Florida

RVogt-Lowell:dt 10/\5/81 KLandis 10/\5/81 HCDance 10/1 /81

PJKeVlogg 10/w/81

