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DEC 8 1985

L-85-452

Dr.J. Nelson Grace  
Regional Administrator, Region II  
U.S. Nuclear Regulatory Commission  
101 Marietta Street, N.W.  
Atlanta, Georgia 30323

Dear Dr. Grace:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inspection Report 85-05

A revised response to the subject inspection report is attached.

Should you or your staff have any questions on this information, please contact us.

Very truly yours,

J.W. Williams, Jr.  
Group Vice President  
Nuclear Energy

JWW/PLP:dh

Attachment

cc: Harold F. Reis, Esquire  
PNS-LI-85-480/2

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## ATTACHMENT

Re: Turkey Point Units 3 and 4  
Docket No. 50-250, 50-251  
IE Inspection Report 250-85-05 and 251-85-05

### FINDING 1:

10 CFR 50.55a(g) requires that inservice testing, to verify operational readiness, of pumps and valves whose function is required for safety, be accomplished in accordance with Section XI of the ASME Boiler and Pressure Vessel (B and PV) Code. ASME B and PV Code, Section XI, 1980 edition through Winter 1980 addenda, has been identified as the applicable code for inservice testing. ASME B and PV Code, Section XI, Paragraph IWV-3415, requires fail-safe valves be tested by observing the operation of the valves upon loss of actuator power. The Main Steam Isolation Valves have been identified as fail-safe valves.

Contrary to the above, inservice testing of pumps and valves and inservice inspection of components were not accomplished in accordance with ASME B and PV Code, Section XI, in that the Main Steam Isolation Valves were fail-safe tested with the instrument air actively connected to the valve actuators.

### RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was that an air reservoir cylinder existed in the air line to the main steam isolation valve (MSIV) actuator and it was assumed that air would always be available to the valve whether or not the instrument air supply was isolated.
- 3) An evaluation is underway to determine fail-safe testing requirements and acceptance criteria for the MSIVs in accordance with ASME B and PV Code, Section XI. The results of this evaluation will be incorporated into the current inservice testing at Turkey Point, as applicable to the testing of the MSIVs. FPL notified the NRC of a 10 CFR Part 21 deficiency concerning the ability to close the main steam isolation valves (MSIVs) in Licensee Event Report (LER) 250-85-020. Our Engineering Department has determined that the design of the MSIVs will have to be modified to allow for fail-safe testing. The fail-safe testing criteria will be provided with the Plant Change Modification package for the MSIVs. This criteria will be incorporated into existing plant procedures that implement Turkey Point's Inservice Testing Program. No change to the program is required.

Rev. 1

- 4) FPL has implemented a Program for Improved Operation that was described in our letters L-84-265 dated September 28, 1984 and L-84-275 dated October 3, 1984. As part of the scope of this program, operability and acceptance criteria are being developed to ensure that adequate testing and acceptance criteria is available to meet the operability requirements as described in the FSAR and Technical Specifications.
- 5) Full compliance for Item 3 above is scheduled to be achieved by the end of the upcoming Unit 4 refueling outage for Unit 4 and upon completion of the modifications for Unit 3.

Rev 1