



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W.
 ATLANTA, GEORGIA 30323

Report Nos.: 50-250/85-36 and 50-251/85-36

Licensee: Florida Power and Light Company
 9250 West Flagler Street
 Miami, FL 33101

Docket Nos.: 50-250 and 50-251

License Nos.: DPR-31 and DPR-41

Facility Name: Turkey Point 3 and 4

Inspection Conducted: October 28 - November 1, 1985

Inspector: G. A. Belisle for
 M. A. Scott

12/3/85
 Date Signed

Approved by: G. A. Belisle
 G. A. Belisle, Acting Section Chief
 Division of Reactor Safety

12/3/85
 Date Signed

SUMMARY

Scope: This routine, unannounced inspection entailed 32 inspector-hours on site in the areas of previous enforcement matters; procurement; and receipt, storage, and handling.

Results: No violations or deviations were identified.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

R. Acoste, Quality Assurance (QA) Superintendent
J. Adonis, Site Engineering Supervisor
*J. Arias, Licensing Supervisor
O. Arredondo, Purchasing Supervisor
J. Balaquero, Technical Support Engineering Supervisor
T. Bruno, QA Engineer, Construction
K. Clotfelter, Senior Plant Engineer
T. Coste, QA Supervisor, Construction
W. Coutier, Senior QA Engineer, Corporate
*P. Crown, QA Engineer, Plant
J. Ferrare, QA Engineer, Plant
*D. Grandage, Operations Superintendent
J. Harper, QA Engineer, Plant
*R. Longtemps, Maintenance Superintendent
*R. Reinhardt, Quality Control (QC) Supervisor, Construction
J. Rhoades, QC Supervisor, Plant
E. Suarez, Configuration Control Supervisor
*H. Young, Plant Manager (Acting)

Other licensee employees contacted included engineers, technicians, mechanics, and office personnel.

NRC Resident Inspectors

T. Peebles
D. Brewer

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on October 31, 1985, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings listed below. No dissenting comments were received from the licensee.

Inspector Followup Item: Material Destined to be Installed in Plant, paragraph 5.

The abbreviations used in this report are as follows:

AP	Administrative Procedure
ASP	Administrative Site Procedure

FPL	Florida Power and Light
ICW	Inlet Cooling Water
JPE	Juno Project Engineering
JUMA	Joint Utility Management Audit
QA	Quality Assurance
QAD	Quality Assurance Department
QC	Quality Control
QI	Quality Instruction
QP	Quality Program
PCM	Plant Configuration Modification

The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection.

3. Licensee Action on Previous Enforcement Matters

(Closed) Unresolved Item 250, 251/83-36-02: Safety Classification of Material and Use of Q List.

NRC Inspection Reports 50-250/84-33 and 50-251/84-34 document an equipment classification review. Equipment classification upgrading was scheduled for completion by the middle of 1985.

4. Procurement (38701)

- References:
- (a) 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants
 - (b) 10 CFR 50.54(a)(1), Conditions of Licenses
 - (c) Topical Quality Assurance Report, FPLTQAR 1-76A
 - (d) 10 CFR 21, Reporting of Defects and Noncompliance
 - (e) Regulatory Guide 1.38, Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants
 - (f) ANSI N45.2.2-1972, Packing, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants
 - (g) Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations)
 - (h) ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

- (i) Regulatory Guide 1.123, Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants
- (j) ANSI N45.2.13-1976, Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants

The inspector reviewed the licensee procurement program required by references (a) through (j) to determine if the program had been established in accordance with regulatory requirements, industry guides, and standards. The following criteria were used during this review to determine the overall acceptability of the established program:

Administrative controls were established to assign departmental responsibilities for procurement activities.

Administrative controls were established to identify safety-related equipment, supplies, consumables, and services to be procured under the QA program.

Administrative controls were established to provide measures and assign responsibilities for the preparation, review, approval, and changes to procurement documents.

Procedures were established for qualifying and maintaining approved vendors, suppliers, and contractors.

Procedures were established to assure that vendors, contractors, and suppliers conform to procurement and quality assurance document requirements, industry standards and codes, and that nonconformances are properly reported and corrected.

Controls were established to provide for audits and surveillances of procurement activities.

The documents listed below were reviewed to determine if the above criteria had been incorporated into the licensee QA program to control procurement of safety-related items and services:

QI3 QAD3	Review of FPL Originated Specifications, Revision 1
QI4 QAD1	QA Review of Procurement Documents, Revision 6
QI6 QAD2	Maintenance of Supplier QA Manuals, Revision 6
QI7 QAD1	Written Communications to Suppliers, Revision 3
QI7 QAD3	Source Surveillance of Supplier Activities, Revision 6
QI7 QAD4	Supplier Annual Review, Revision 4
QI7 QAD5	Establishing and Maintaining the QA Approved Supplier List, Revision 4
QI7 QAD6	Methods for Supplier Evaluation, Revision 4



QI16 QAD3	Controlling Contractor/Supplier Audit Open Items, Revision 4
AP 0190.4	Procurement Document Control, April 10, 1985
AP 0190.15	Plant Changes and Modifications, July 31, 1985
ASP-7	Procurement, Revision 4
PUR7-8	Instructions for the Review, Transmittal, and Disposition of Supplier Deviation Notices, Revision 1
QP 4.1	Control of Requisitions and the Issuance of Purchase orders for Spare Parts, Replacement Items, and Services, Revision 16

The inspector conducted interviews with on-site staff which included the QA, JPE, QC, and Purchasing departments to assess their involvement in the procurement area. Each group's functional area and interface points were discussed. All concerns identified by the inspector were eventually resolved or found to be previously identified in licensee audit reports. The inspector did not contact corporate personnel involved with vendor surveillances but did talk with site employees who perform surveillances.

The inspector was informed by site personnel that a new Q-list which details all safety-related components will be issued by November 15, 1985. The new Q-list is being expanded and contains more plant components. The addition of these new Q-list items will result in a significant increase of on site work effort since many phases of procurement, storage, handling, inspection, and documentation will be affected by these items.

Audit reports performed by FPL Corporate QA, site QA, and JUMA in the areas of procurement and receipt, storage, and handling that were reviewed by the inspector are as follows:

<u>Audit Number</u>	<u>Performance Dates</u>
QAO-PTP-83-12-512	December 20, 1983 to January 5, 1984
QAO-PTP-84-01-524	January 13, 1984 to January 30, 1984
QAP-PUR-84.1	June 26, 1984 to August 10, 1984
QAP-85-361	February 5 to April 3, 1985
QAS-QAD-85-1	March 25 to March 29, 1985
QAO-TPB-85-110	*
QAO-TPB-85-107	**

*Construction QA exited with construction personnel on October 10, 1985.

**Construction QA was in the final stages of this audit. Draft copies of both asterisk (s) - marked audits were provided to the inspector.

The significance of audit QAO-TPB-85-107 is discussed in paragraph 5.



The inspector reviewed completed PCM packages for material ordering information to verify that correct material had been utilized. This review disclosed information that is discussed in the next four paragraphs. The PCM packages reviewed were as follows:

<u>PCM Number</u>	<u>Title</u>
84-89	Containment Purge Valve Bolts
82-322	ICW Check Valve Replacement
80-79	Modifications to Auxiliary Feedwater Turbine Steam Supply Valves

Although FPL construction performs the majority of PCM work, plant groups do perform some modifications. Both PCM installation groups are separate and so are the QA and QC groups overseeing the work. Although many instructions regarding PCM performance are common between groups, several are not. There are currently no checklists or formats for content of a PCM package. Construction QA has recently been tasked with the final review of all completed packages which should improve content continuity.

PCM packages 84-89 and 82-322 did not contain purchase orders or ordering specifications, while 80-79 did. Site procedures do not require that purchase orders remain with the PCM package. The purchase orders were identified in package 84-89 and were retrievable after several investigatory steps. Purchase order retrieval for package 82-322 required several more site and corporate contact points prior to retrieval. Specifications were retrievable once the purchase orders were located. Packages 84-89 and 80-79 were construction backfit PCMs while package 82-322 was a plant PCM.

The PCM 82-322 package contained a letter from the valve vendor which indicated that only one pressurized air dampener (in lieu of two on the previous, replaced valves) would be required on the new valves. No drawing changes were indicated in the package for the air supply to the valves. The inspector talked with a technical support engineer about the actual valve dampener configuration. Although it was not documented, two dampeners were observed by the inspector to be installed on the valves and, thus, an air supply drawing change would not be warranted. Although not documented in the PCM package, the need for two dampeners per valve was documented in separate correspondence between JPE corporate and site.

The detailed valve drawings for the ICW valves of PCM 82-322 were not in the PCM package. The drawings were ordered by the valve purchase order. In conjunction with QC personnel who had used the drawings during valve receipt inspection, the inspector located the valve drawings. The technical support group who are generating two PCM proposals on the ICW check valves were unaware of the drawings but indicated that the drawings would be placed in their filing system.

The inspector reviewed the Purchasing Department's supplier deviation notice system. Whenever a supplier cannot provide material as specified on a FPL purchase order, certain licensee actions must be performed. The inspector looked at followup actions on ten purchase order deviations.

Within this area, no violations or deviations were identified.

5. Receipt, Storage, and Handling of Equipment and Materials (38702)

- References:
- (a) 10 CFR 50.54(a)(1), Conditions of Licenses
 - (b) Typical Quality Assurance Report, FPLTQAR 1-76A
 - (c) 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants
 - (d) Regulatory Guide 1.38, Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants
 - (e) ANSI N45.2.2-1972, Packing, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants
 - (f) Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations)
 - (g) ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

The inspector reviewed the licensee program and procedures required by references (a) through (g) to determine if controls were established and being implemented for receipt inspection, initiation of nonconformance reports, disposition of nonconformances, handling, storage, and issue of safety-related equipment. The following criteria were used during this review:

Administrative controls were established for conducting and documenting receipt inspections and reporting nonconformances.

Administrative controls were established for disposition of items, marking, storing, and protection during storage.

Administrative controls were established for limited shelf-life items and for performing audits and surveys for storeroom activities.

The following procedures were examined to determine if selected elements of receipt inspection, storage, and handling were being implemented.

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|-----------|---|
| QI16 QAD4 | Corrective Action Follow-up for Quality Assurance Audits, Revision 8 |
| QI16 QAD6 | Turkey Point Construction Quality Assurance Surveillances, Revision 1 |

AP 0149.1	Special Nuclear Material Accountability, January 14, 1982
AP 0190.12	Nonconforming Material, Parts, or Components, February 8, 1982
AP 0190.72	Receipt Inspection, Identification and Control of Nuclear Safety Related and Fire Protection Parts, Material, and Components, May 24, 1985
AP 0190.73	Quality Control Inspection and Surveillance Program, May 21, 1985
ASP-9	Material Control, Revision 3
ASP-11	Construction Turnover, Revision 7
ASP-14	Control of Material Temporarily Removed from Normal Operating Position, Revision 3
QI-13-S-1	Handling, Storage and Shipping Power Plant Stores, Revision 7

Presently, the two-warehouse system at the site is changing. Two separate warehouses, receipt inspections, and storage controls had been operated by the plant and construction groups. At the time of this inspection, safety-related material was being transferred from the plant warehouse to the construction warehouse where it would be maintained on a permanent basis. Many fine points of the transition were being worked out.

Audit Report QAO-TPB-85-110, performed by construction QA, addressed problems that were occurring with material transition to the construction warehouse. The problem areas in the report were as follows:

- Failure to maintain storage requirements
- Failure to observe vendor storage requirements
- Shelf-life program not being effectly implemented

The QA report findings had been presented to the responsible groups and corrective actions had been determined.

Plant QA was in the process of performing an audit of plant receipt, storage, and handling during this inspection. The inspector questioned the auditors about the scope, depth, and findings that occurred during the audit. The auditors were aware of findings discussed above and in audit QAD-TPB-85-107; the auditors were looking in those additional areas. The plant auditors had not found any significant findings at the time of this inspection.



The inspector tracked two material nonconformance reports that were generated on site during the inspection. The inspector evaluated the nonconformance issues, the handling controls, and the technical resolutions of the material problems. Nonconformance report 85-166, which was written by plant QC, revealed several problems with a pump motor bearing ordering data. The QC group and JPE were taking action to correct data problems which even involved original Westinghouse information.

The plant QC receipt inspection group has recently reorganized. Due to the reorganization, new supervisors had been assigned. Since the reorganization, material identification problems have increased dramatically during receipt inspection.

Within this area, one inspector followup item was identified. Paragraph 5.2.13.3 of reference (g) requires control/identification of material, parts, and components from receipt through installation and throughout plant life. A draft of Audit Report QAO-TPB-85-107, finding I, which was not yet presented to site personnel, cited numerous items in storage and items issued but not yet installed that were not identified with appropriate markings or tags. The report further stated that site personnel were not required to verify correct material at installation. The inspector had independently come to the same conclusion that material control post receipt could cause regulatory if not actual problems. Until the utility resolves these self-identified problems, this item will retain an inspector followup item 250, 251/85-36-01.

