

APR 30 1986

Docket Nos. 50-250
and 50-251

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Mr. C. O. Woody, Group Vice
President
Nuclear Energy Department
Florida Power and Light Company
Post Office Box 14000
Juno Beach, Florida 33408

Dear Mr. Woody:

Subject: Request for Additional Information, Generic Letter (GL)
83-28 Items 3.1.2, 3.2.1 and 3.2.2

Reference: TAC Numbers 52972, 52973, 53809 and 53810

By letter dated November 8, 1983, you provided your responses to GL 83-28 which included Item 3.1.2, "Post-Maintenance Testing (Reactor Trip System Components)," and Items 3.2.1 and 3.2.2, "Post-Maintenance Testing (All Other Safety-Related Components)."

We have reviewed your submittals and require the additional information requested in the enclosure to complete our review effort. We request that the information be provided within 30 days from receipt of this letter. If you require additional time, please provide your schedule within 15 days.

The reporting and/or recordkeeping requirements of this letter affect fewer than 10 respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

/s/

Daniel G. McDonald, Project Manager
PWR Project Directorate #2
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Enclosure:
As stated

cc w/Enclosure:
See next page

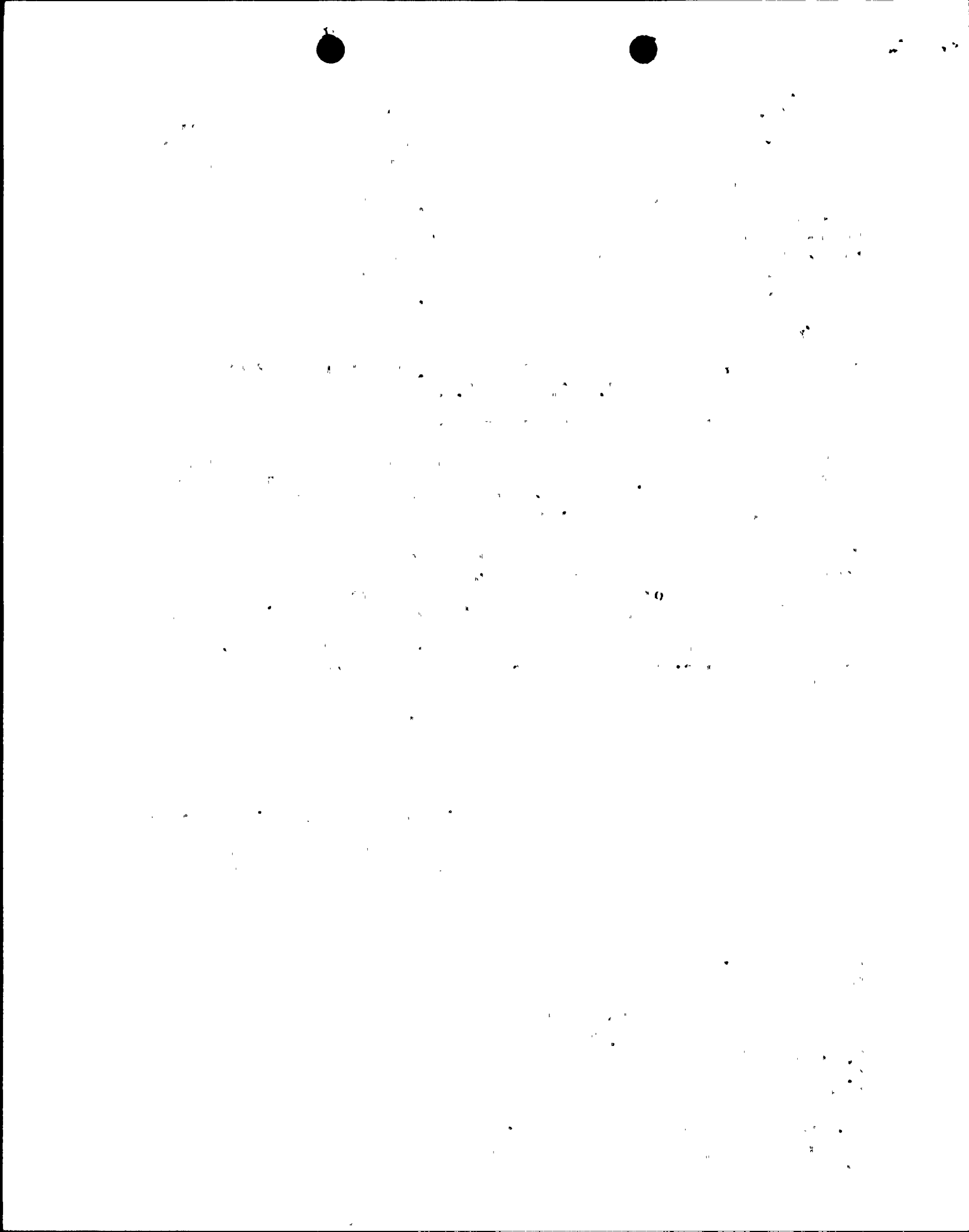
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REQUEST FOR ADDITIONAL INFORMATION
TURKEY POINT UNITS 3 AND 4
GENERIC LETTER 83-28, ITEMS 3.1.2, 3.2.1, AND 3.2.2

A. Item 3.1.2 - Check of Vendor and Engineering Recommendations for Testing and Maintenance (Reactor Trip System)

You indicated, in your response, that vendor information concerning reactor trip system components is obtained from Westinghouse. You also state that vendor recommendations have been incorporated into Turkey Point procedures; however, it is not quite clear from the response whether this review action entailed a review or re-check of previous vendor and engineering recommendations and comparison with current procedures to ensure that appropriate test guidance is included in applicable procedures or the Technical Specifications. If your re-evaluation of your review process and records does adequately verify that appropriate vendor and engineering recommendations have been incorporated into current test and maintenance procedures, you need to provide an unambiguous statement confirming that the requirements of Action Item 3.1.2 have been completed, and that the post-maintenance testing will verify component capability to perform its safety functions. If your re-evaluation does not confirm an adequate review, you should submit a schedule for when this review will be completed or justification for not performing a re-review.

B. Item 3.2.1 - Review of Test and Maintenance Procedures and Technical Specifications (All Other Safety-Related Components)

It was concluded from review of your submittal dated November 8, 1983, that you have several Administrative Procedures which require that post-maintenance testing be performed and that maintenance instructions and plant work orders contain requirements for post-maintenance operational testing of safety related structures, systems, and components prior to the equipment being returned to service. It is also understood that the procedures require maintenance requests and plant work orders to be reviewed by the responsible sections prior to the performance of maintenance to assure that post-maintenance testing is specified, if required. Also, procedures state that at the conclusion of the work, QC reviews the documents to further assure that testing has been performed. However, it could not be determined from your response whether the maintenance procedures, Technical Specifications, and post-maintenance test procedures were actually re-reviewed to determine if testing was specified and if the testing adequately demonstrates that safety related components are capable of performing their intended safety functions. Based on NRC inspection findings, reported in NRC Report Nos. 50-250, 251/85-40 and 85-32, it appears that programs may be weak and not being fully implemented to assure adequate post maintenance testing is accomplished. In addition, the programs in place do not encompass all disciplines and types of maintenance, including troubleshooting. Considering the above, you need to submit an unambiguous



statement confirming that post-maintenance testing is specified and that the procedures were adequately reviewed to ensure that the testing adequately verifies component capability to perform all safety functions. If a re-review was not performed, you should submit a schedule for when this will be completed or a justification for not performing a re-review.

C. Item 3.2.2 - Check of Vendor and Engineering Recommendations for Testing and Maintenance (All Other Safety-Related Components)

You indicated that a review of Westinghouse Technical Bulletins, vendor manuals, engineering recommendations and other industry information systems was required by procedures and that applicable information was subsequently entered into the FPL Operating Experience Program for tracking and implementation. However, it is not clear from this response whether you performed a review which entailed a check of vendor and engineering recommendations against your procedures to ensure that appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications. If a review was performed and adequately verified that appropriate vendor and engineering recommendations have been incorporated into test and maintenance procedures for safety-related components, you need to provide an unambiguous statement confirming that the requirements of Action Item 3.2.2 have been completed. If not, you should submit a schedule for when this review will be completed.