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

Report Nos.: 50-250/86-31 and 50-251/86-31

Licensee: Florida Power and Light Company
9250 West Flagler Street
Miami, FL 33102

Docket Nos.: 50-250 and 50-251 License Nos.: DPR-31 and DPR-41

Facility Name: Turkey Point 3 and 4

Inspection Conducted: June 2-6, 1986

Inspectors: W. P. Kleinsorge — July 2, 1986 Date Signed

J. E. Menning — July 2 1986 Date Signed

Approved by: J. J. Blake, Section Chief — July 2, 1986 Date Signed
Engineering Branch
Division of Reactor Safety

SUMMARY

Scope: This routine, unannounced inspection involved the areas of licensee actions on previous enforcement matters (92701B and 92702B), housekeeping (54834B), material identification and control (42902B), material control (42940B), Gulfalloy supplied materials (92705B), inservice testing of pumps and valves (61700 and 61726), IE Bulletins (IEBs) (92703B), followup on IE Notices (IEN) (92717) and inspector followup items.

Results: One violation was identified - 50-250/86-31-04: "Failure to Lock and Verify the Locked Condition of Valve 3-891A During IST" - paragraph 7b. One deviation was identified 50-250, 251/86-31-01: "Failure to Submit ISI Relief Request as Committed" - paragraph 3a.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*C. M. Wethy, Site Vice President PTN
*C. T. Baker, Plant Manager
*M. J. Crislene, Quality Control (QC) Supervisor
*W. Bladow, Quality Assurance (QA) Supervisor
*J. A. Labarraque, Technical Department Supervisor
*J. Arias, Jr., Regulatory Compliance Supervisor
*B. A. Abrishami, System Performance Supervisor
*E. L. Anderson, PNS ISI Specialist
*H. E. Hartman, ISI Coordinator
*R. Hart, Licensing Engineer

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

Other Organization

D. E. Boger, Factory Mutual ANII

NRC Resident Inspectors

T. A. Peebles

*D. R. Brewer

*Attended exit interview

2. Exit Interview (30703B)

The inspection scope and findings were summarized on June 6, 1986, with those persons indicated in paragraph 1 above. The inspectors described the areas inspected and discussed in detail the inspection findings listed below. No dissenting comments were received from the licensee.

(Open) Deviation 50-250, 251/86-31-01: "Failure to Submit ISI Relief Request as Committed" - paragraph 3a

(Open) Unresolved Item 50-250, 251/86-31-02: "Pipe Support Removal and Reinstallation Authorization" - paragraph 5

(Open) Inspector Followup Item 50-250, 251/86-31-03: "Gulfalloy Supplied Materials" - paragraph 6

(Open) Violation 50-250/86-31-04: "Failure to Lock and Verify the Locked Condition of Valve 3-891A During IST" - paragraph 7b

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

3. Licensee Action on Previous Enforcement Matters (92701B) (92702B)

a. (Closed) Violation 50-250, 251/83-07-01: "Failure to Provide Adequate Inservice Testing and Inspection Procedures"

FP&L letter of response, dated May 12, 1983, has been reviewed and determined to be acceptable by Region II. The inspectors held discussions with cognizant engineers and examined the corrective actions as stated in the letter of response. The inspectors concluded that FP&L had determined the full extent of the subject noncompliance, performed the necessary survey and follow-up actions to correct the present conditions and developed the necessary corrective actions to preclude recurrence of similar circumstances. However, because the licensee had not implemented a commitment contained in the aforementioned letter of response, the inspectors closed the violation and identified a deviation discussed below.

Page 3 to FP&L Letter No. L-83-299 dated May 12, 1983, states in part:

> "FPL will request a relief from the Code requirement. FPL does not plan to reexamine these welds pending followup action to be taken on this item since we are still in the first inspection interval ... implementation will be achieved prior to the termination of this Inspection Interval."

It should be noted that the first 10 year inspection interval ended on February 21, 1984 for Unit 3, and April 14, 1984 for Unit 4. The second 10 year intervals started February 22, 1984 and April 15, 1984 for Units 3 and 4, respectively. To date, the above discussed relief request has not been submitted to the NRC for consideration.

Therefore, the licensee has deviated from a commitment to the Commission in that they failed to submit a relief request prior to the termination of this (the first ten year) interval. This deviation will be identified as 50-250, 251/86-31-01: "Failure To Submit ISI Relief Request As Committed."

b. (Closed) Violation 50-250, 251/83-35-02: "Failure to Provide Appropriate Acceptance Criteria In IST Procedure."

FP&L letter of response, dated December 16, 1983, has been reviewed and determined to be acceptable by Region II. The inspectors held discussions with cognizant engineers and examined the corrective actions as stated in the letter of response. The inspector concluded that FP&L had determined the full extent of the subject noncompliance, performed the necessary survey and follow-up actions to correct the present conditions and developed the necessary corrective actions to

preclude recurrence of similar circumstances. The corrective actions identified in the letter of response have been implemented.

c. (Closed) Violation 50-250/84-12-01: "Failure To Follow Maintenance Procedure."

FP&L letter of response, dated May 12, 1984, has been reviewed and determined to be acceptable by Region II. The inspectors held discussions with cognizant engineers and examined the corrective actions as stated in the letter of response. The inspectors concluded that FP&L had determined the full extent of the subject noncompliance, performed the necessary survey and follow-up actions to correct the present conditions and developed the necessary corrective actions to preclude recurrence of similar circumstances. The corrective actions identified in the letter of response have been implemented.

d. (Closed) Unresolved Item 50-250, 251/85-07-01: "Nonretrievable or Nonexistent OQE"

This item concerns nonexistent or nonretrievable Objective Quality Evidence (OQE) that attested to the completion of corrective actions for Violation 250/84-12-01. The inspectors have determined that the corrective actions in questions had been completed as stated in the letter of response, but were at the time not documented. That documentation is now complete and the inspectors have no further questions. This matter is considered closed.

Within the areas examined, no deviations or violations were identified except as noted in paragraph 3a.

4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve violations or deviations. One new unresolved item identified during this inspection is discussed in paragraph 5.

5. Independent Inspection Effort

Housekeeping (53834B), Material Identification and Control (42902B) and Material Control (42940B)

The inspector conducted a general inspection of the protected area to observe activities such as housekeeping, material identification, material control, and storage.

With regard to the inspection above, the inspectors noted a pipe support, (identified with a white paper tag marked 622AH2) that was not made up (support was attached to the pipe but not attached to the overhead.) This pipe, a portion of the component cooling water system, was identified as piece 6 on Drawing 5610-FSK-621-A-R3. At the time of this examination it

could not be determined whether the support disassembly had been authorized, and whether provisions had been made to assure reinstallation and inspection of the same. The licensee indicated that they would look further in to this matter. Pending NRC review of the licensee's resolution this matter will be identified as Unresolved Item 50-250,251/86-31-02: "Pipe Support Removal and Reinstallation Authorization."

Within the areas examined no violations or deviations were identified.

6. Gulfalloy Supplied Materials (92705B) (Units 3 and 4)

The inspectors discussed the status of the implementation of the program for the determination of serviceability of Gulfalloy supplied materials with the licensee. The licensee indicated to date that 45% of the piping, 66% of the fittings, 100% of the tubing, 73% of the structural shapes, 18% of the structural plate and 60% of the bolting materials had been accepted as of January 16, 1986. The remaining materials representing 60% of the total Gulfalloy supplied materials are still being dispositioned.

The Gulfalloy issue was identified as a result of IE Bulletin 83-06 and is discussed in NRC RII Reports 50-250, 251/85-07, 50-250, 251/85-34 and 50-250, 251/86-06. IEB 83-06 is closed in this report (50-250,251/86-31), therefore, for tracking purposes, the Gulfalloy issue will be identified as Inspector Followup Item 50-250, 251/86-31-03: "Gulfalloy Supplied Materials".

Within the areas examined, no violations or deviations were identified.

7. Inservice Testing of Pumps and Valves (Units 3 and 4) (61700) (61726)

The inspectors reviewed procedures, observed in-process testing, and reviewed records as described below, to determine whether applicable code, procedure, and regulatory requirements were being met. The applicable code for inservice testing (IST) of pumps and valves is ASME B&PV Code 74S75 prior to December 14, 1982, and 80W81 from December 14, 1982 to December 14, 1992.

a. The inspectors reviewed the below listed procedure to determine adequacy with specific attention directed to the following: the general technical and administrative adequacy; plant equipment status evaluation and identification; description of hydraulic circuit used; location and type of measurement for each test quantity; allowable ranges of test quantities; minimum flow and/or pressure for pump to fulfill safety function; minimum system operation time for stabilization of test quantities; realignment of hydraulic circuits; plant equipment status changes properly identified; reviews of test results (pump declared inoperable if in required action range), analysis (complete within 96 hours), provisions to increase test frequency for test quantities in alert range; and recording requirements including date of test, measured quantities, observed quantities, identification of instruments used, comparisons with

allowable ranges of test values and signature of person or persons responsible for conducting and analyzing test data.

Procedures

OP 4004.1, March 28, 1986, "Containment Spray Pumps - Periodic Test"

b. The inspectors observed the testing of the below listed pumps to verify adequate implementation of applicable procedure requirements.

Pump Identification

Containment Spray Pump 3A
Containment Spray Pump 3B

With regard to the inspection above, the inspectors noted that paragraph nos. 8.8.3 and 8.8.4 of FP&L OP 4004.1, dated March 28, 1986, state in part:

"8.8.3 Unlock, Close and Lock Valve *891A...

8.8.4 A second person shall independently verify that *-891A... is locked closed..."

Contrary to the above during the 3A containment spray pump test valve 3-891A (*891A) was closed but not locked closed with both steps 8.8.3 and 8.8.4 signed off. Therefore, the licensee failed to implement procedure FP&L-OP 4004.1 requirements to lock close, and independently verify the locked closed condition of valve 3-891A during the 3A containment spray pump test. The above is in violation of Technical Specification (TS) 6.8.1 that requires written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33. This violation will be identified as 50-250/86-31-04: "Failure to Lock and Verify the Locked Condition of Valve 3-891A During IST."

c. To determine the adequacy of test procedures for the establishment of pump measurement reference valves, the inspectors reviewed the below listed procedure. Specific attention was directed to the following: the general technical and administrative adequacy; as a prerequisite the pump must be established as operating acceptably; results of test, if pump is demonstrated to be operating acceptably, will provide new reference values and need not meet previous acceptance limits; plant equipment status evaluation and identification; description of hydraulic circuit used; location and type of measurement for each test quantity; allowable ranges of test quantities; minimum flow and/or pressure for pump to fulfill safety function; minimum system operation time for stabilization of test quantities; realignment of hydraulic circuits; plant equipment status changes properly identified; reviews of test results (pump declared inoperable if in required action range) analysis (complete within 96 hours), provisions to increase test

frequency for test quantities in alert range; and recording requirements including date of test, measured quantities, observed quantities, identification of instruments used, comparisons with allowable ranges of test values, and signature of person or persons responsible for conducting and analyzing test data.

Procedures

TP-054, November 23, 1983 "Containment Spray Pumps-Reference Valve Test"

d. To verify adequate implementation of procedures for establishment of pump test measurement reference values the inspectors reviewed test records for the pumps listed below to determine compliance with procedure requirements.

Pumps Identification

Containment Spray Pump 3A
Containment Spray Pump 3B

Within the areas examined, no violations or deviations were identified except as noted in paragraph 7b.

8. IE Bulletin (IEB) (92703B)

a. (Closed) IEB 83-03: "Check Valve Failures in Raw Water Cooling Systems of Diesel Generators," Units 3 and 4.

The inspectors have reviewed FP&L letter of June 8, 1983 and determined that the requested action of the bulletin have been acceptably addressed. The inspectors held discussions with responsible utility representatives, reviewed supporting documentation and observed representative samples of work to verify that the action identified in the letter of response has been completed.

b. (Closed) IEB 83-06, "Nonconforming Materials Supplied by Tube-Line Corporation." (Units 3 and 4)

The inspectors have reviewed FP&L letters of December 6, 1983, January 20, 1984, September 28, 1984, November 8, 1984, December 17, 1984, January 4, 1985, February 15, 1985, (inadvertently, dated February 15, 1984), and April 29, 1985, and determined that the requested actions of the bulletin have been acceptably addressed. The inspectors held discussions with the responsible engineer, reviewed supporting documentation and observed representative samples of work to verify that the actions identified in the letter of response have been completed.

9. Followup on IE Information Notices (IEIN) (Units 3 and 4) (92717B)

The inspectors verified that the following IEINs were received, reviewed and that appropriate corrective action had been taken or was planned. These IEINs are identified and their status is and summarized below for record purposes.

IEIN No.	Title	Licensee Status
83-70	SUPPLEMENT 1: VIBRATION-INDUCED VALVE FAILURES	In Process
84-47	POTENTIAL EFFECT OF LINE-INDUCED VIBRATION ON CERTAIN TARGET ROCK SOLENOID-OPERATED VALVES	Complete
85-15	NON-CONFORMING STRUCTURAL STEEL FOR SAFETY RELATED USE	In Process
85-17	SUPPLEMENT 1: POSSIBLE STICKING OF ASCO SOLENOID VALVES	Complete
85-20	SUPPLEMENT 1: MOTOR-OPERATED VALVE FAILURES DUE TO HAMMERING EFFECT	In Process
85-22	FAILURE OF LIMITORQUE MOTOR-OPERATED VALVES RESULTING FROM INCORRECT INSTALLATION OF PINION GEAR	Complete
85-35	FAILURE OF AIR CHECK VALVES TO SEAT	In Process
85-59	VALVE STEM CORROSION FAILURES	Complete
85-67	VALVE-SHAFT-TO-ACTUATOR KEY MAY FALL OUT OF PLACE WHEN MOUNTED BELOW HORIZONTAL AXIS	In Process
86-01	FAILURE OF MAIN FEEDWATER CHECK VALVES CAUSES LOSS OF FEEDWATER SYSTEM INTEGRITY AND WATER-HAMMER DAMAGE	In Process
86-02	FAILURE OF VALVE OPERATOR MOTOR DURING ENVIRONMENTAL QUALIFICATION TESTING	In Process
86-05	MAIN STEAM SAFETY VALVE TEST FAILURES AND RING SETTING ADJUSTMENTS	In Process
86-09	FAILURE OF CHECK AND STOP CHECK VALVES SUBJECTED TO LOW FLOW CONDITIONS	Complete
86-12	TARGET ROCK TWO-STAGE SRV SETPOINT DRIFT	In Process

IEIN No.	Title	Licensee Status
86-34	IMPROPER ASSEMBLY, MATERIAL SELECTION AND TEST OF VALVES AND THEIR ACTUATORS	In Process
86-38	DEFICIENT OPERATOR ACTIONS FOLLOWING DUAL FUNCTION VALVE FAILURES	In Process

10. Inspector Followup Items

a. (Closed) Item 50-250/85-03-01: "Pressure Isolation Valve Incorrectly Designated In Technical Specifications"

This item concerned the misidentification of valves 3-875c and 3-876b in Table 3.16-1 to the Technical Specifications. The misidentification was corrected in FP&L Letter L-86-193 requesting amendment to the Technical Specification. The inspectors have no further questions. This matter is considered closed.

b. (Closed) Item 50-250, 251/85-34-03: "Deficiency Report Discrepancies"

This item concerns Deficiency Report discrepancies related to Gulfalloy supplied materials. The necessary corrections have been made. The inspectors have no further questions and therefore this item is considered closed.