

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W., SUITE 2900
ATLANTA, GEORGIA 30323



Report Nos.: 50-250/87-31 and 50-251/87-31

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 9-12, 1987

Inspector:

W. P. Kleinsorge
W. P. Kleinsorge

July 1, 1987
Date Signed

Approved by:

J. J. Blake
J. J. Blake, Section Chief
Engineering Branch
Division of Reactor Safety

7/2/87
Date Signed

SUMMARY

Scope: This routine, announced inspection was conducted in the areas of licensee actions on previous enforcement matters (92701B) (92702B), and inspector followup items (IFI).

Results: No violations or deviations were identified.



REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *C. M. Wethy - Site Vice President
- *C. J. Baker - Plant Manager
- *J. A. Labarraque - Technical Dept Supervisor
- *J. Arias Jr. - Regulatory Compliance Supervisor
- *V. T. Chilson - Principal Engineer
- *R. D. Hart - Licensing Engineer

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

NRC Resident Inspectors

- *D. R. Brewer, Senior Resident Inspector (SRI)
- K. Van Dyne, Resident Inspector (RI)
- J. MacDonald, RI

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on June 12, 1987, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings. No dissenting comments were received from the licensee.

(Open) Inspector Follow Item 50-250, 251/87-31-01: "Thread Engagement Final Report" - paragraph 3a.

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 (92701B) (92702B)

- a. (Closed) Violation 50-250, 251/85-09-01: "Failure to Provide Acceptance Criteria for Thread Engagement"

FP&L letters of response, dated June 13, 1985, July 1, 1985, August 21, 1985, November 25, 1985, and October 3, 1986, have been reviewed and determined to be acceptable by Region II. The inspector held discussions with the cognizant engineers and examined the corrective actions as stated in the letters of response. The



inspector concluded that FP&L had determined the full extent of the subject violation, performed the necessary survey and follow-up actions to correct the present conditions and developed the necessary correction actions to preclude recurrence of similar circumstances. The corrective actions identified in the letter of response have been implemented.

To date, all pressure boundary piping threaded fastener joints have been inspected, 246 joints required immediate correction and were documented on NCR's and corrected, 260 joints will be scheduled for replacement during regular maintenance, and 217 joints are currently indeterminate. The licensee has completed all the actions listed in the letters of response with the exception of the submittal of the summary of results and any corrective actions taken or planned. This matter will be closed as a violation. For tracking purposes, pending the NRC review of final summary of results, this matter will be identified as Inspector Followup Item (IFI) 50-250, 251/87-31-01: "Thread Engagement Final Report."

- b. (Closed) Violation 50-250, 251/85-09-02: "Failure to Include the Accumulator Pressure Relief Valves in the ASME Section XI Pump & Valve Program"

In their July 1, 1985 response, FP&L did not concur with the subject violation. NRC Region II requested The NRC Office of Nuclear Reactor Regulation (NRR) to provide assistance regarding the testing requirements of ECCS accumulator tank relief valves at Turkey Point, Units 3 and 4. In a letter, dated March 31, 1986, NRR responded that it had been determined that the testing of the ECCS accumulator tank relief valves at Turkey Point, Units 3 and 4, is not required under the requirements of the Turkey Point inservice testing code of record.

In view of the above, this matter is considered closed.

- c. (Open) Unresolved Item 50-251/86-06-03: "Adequacy of Corrective Action Taken on Failed Containment Spray Pump Shaft"

The inspector discussed this matter with the licensee, who indicated that they were not prepared to discuss this item during this inspection. This matter will remain open.

- d. (Closed) Deviation 50-250, 251/86-31-01: "Failure to Submit ISI Relief as Committed"

FP&L letter of response, dated August 19, 1986, has been reviewed and determined to be acceptable by Region II. The inspector held discussions with the cognizant engineer 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 deviation, 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.

- e. (Closed) Violation 50-250/86-31-04: "Failure to Lock and Verify the Locked Condition of Valve 3-891A During IST"

FP&L letter of response, dated August 19, 1986, has been reviewed and determined to be acceptable by Region II. The inspector held discussions with the cognizant engineer 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 violation, 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.

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

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Inspector Followup Items

- a. (Closed) Item 50-250/85-07-02: "IWF - ISI Inspection Plan"

This item concerned the fact that CIS-PTP-85-300, "Ten Year Inservice Inspection Plan for Turkey Point Unit 3", Revision 0 did not address the inspection requirements of ASME B&PV Code, Section XI, Subsection IWF-2000. The licensee has revised CIS-PTP-85-300 to include the IWF-2000 requirements. The inspector has no further questions. This matter is considered closed.

- b. (Closed) Item 50-250, 251/85-34-01: "Caps, Covers and Closures"

This item concerned caps, covers and closures missing or not intact on 15 safety and non safety-related pumps and valves. The inspectors during Inspection 50-250, 251/85-34 discussed the above with the licensee who indicated that there was no FP&L documented program requirements that addressed specifically caps, plugs, and closures. At the time of the inspection, it could not be determined whether the improperly protected/stored components had been degraded. The licensee indicated that they would review their storage program relative to caps, covers, and closures and make the necessary changes. In addition, the licensee indicated that they would evaluate the above components for degradation. Pending NRC review of the licensee's above review and evaluation, this matter was identified as an inspector followup item.

The licensee has subsequently performed two audits of storage activities. The licensee has programatically addressed caps, covers and closures in FP&L Stores Quality Instruction QI-13-S-1 Rev. 12.

This inspector performed a walkdown inspection of the warehouse and storage areas. This inspector noted no examples of improper storage conditions relating to safety-related materials or equipment; however, the inspector did observe numerous examples of non safety-related materials and equipment with degraded closures.

Regarding the adequacy of caps, covers and closures for safety-related items, the inspector has no further questions. This matter is considered closed.

c. (Closed) Item 50-250, 251/86-06-01: "Accountability Procedures"

Generic Letter 85-02, "Staff Recommended Actions Stemming from NRC Integrated Program for Resolution of Unresolved Safety Issues Regarding Steam Generator Tube Integrity", was issued April 17, 1985, for the purpose of obtaining information on the overall program for steam generator tube integrity and steam generator tube rupture mitigation.

The inspector during inspection 50-250, 251/86-06 determined that licensee's accountability procedures did not contain accountability measures for components and parts removed from the internals of major components (e.g. reassembly of cut and removed components). The licensee agreed to reevaluate their accountability in this area. Pending NRC review of the licensee's evaluation, this matter was identified as an inspector followup item.

The licensee has completed their review and made the following conclusion: "Based upon this review of current Plant/Backfit Procedures, it can be determined that there are adequate controls and accountability measures to assure that no foreign objects remain unaccounted for. There is an established method by which all work is planned, reviewed, approved and documented. In each case, procedures address access control and the requirements thereof or require a determination to be made if access control is required. Visual inspections are made to verify no loose or foreign parts remain in the component or system. While none of the procedures reviewed specifically state a requirement to 'reassemble cut and removed components', it is evident that the intent is to determine if access control/material accountability is required, and delineate these requirements in the specific implementation documentation, with the end result; assurance that all known foreign parts be removed from the component prior to putting the system in operation after work is completed. Therefore, it can be concluded that FPL's Accountability Procedures meet or exceed the staff (NRC) recommended action of 1.b(4) in Generic Letter 85-02."



The inspector does not concur with the above, in that the central issue of 1b(4) is not adequately addressed. However, as there is no regulatory basis for further action, this matter is considered closed.

d. (Open) Item 50-250, 251/86-31-03: "Gulfalloy Supplied Materials"

The inspector discussed the status of the implementation of the program for the determination of serviceability of Gulfalloy supplied materials with the licensee. The licensee indicated that to date 99.9 + % (1 linear foot of pipe used in a structural application remains of the original 13,900 linear feet) of the piping, 97% of the fittings, 100% of the tubing, 80% of the structural shapes, 40% of the structural plate and 100% of the bolting materials had been 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; 50-250, 251/86-06; 50-250, 251/86-31; 50-250, 251/86-44; and 50-250, 251/87-04.

Since the last inspection, the licensee has closed the following nonconformance reports (NCRs):

426-85
446-85
1527-85

The following NCRs have been dispositioned and are in the final concurrence cycle:

042-85
417-85
193-85
453-85
450-85
443-85
430-85

The following NCRs remain open:

197-85
462-85
414-85
463-85

This item will remain open pending NRC review of the NCRs in concurrence routing and the open NCRs.

- e. (Closed) Item 50-250, 251/86-44-03: "Relief Request Status"

This item concerns inconsistencies in the status of relief requests for the inservice inspection program. The licensee has revised the relief request summary in both units Second Ten Year Inspection Plans to make them consistent with the actual status of the relief requests. This matter is considered closed.

- f. (Closed) Item 50-250, 251/86-44-05: "Off Site Storage Controls"

This item concern the fact that the FP&L Corporate Records Center located at Rivera Beach, Florida did not have a formal documented program for the storage of "special process records" (such as radiographs, photographs, negatives, and microfilm), which are light-sensitive, pressure sensitive, temperature sensitive, or humidity sensitive. The licensee indicated that they would amend the training manual to include specific requirements for the storage environment for "special process records". Pending NRC review of the amended training manual, this matter was identified as an inspector followup item.

The licensee has revised the training manual to include the necessary parameters. The inspector has no further questions. This matter is considered closed.

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

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