



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

Report Nos.: 50-250/87-37, 50-251/87-37

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

Docket Nos.: 50-250, 50-251

License Nos.: DPR-31 and DPR-41

Facility Name: Turkey Point 3 and 4

Inspection Conducted: September 8 - 11, 1987

Inspectors: f. S. Mellen 9/25/87
f. S. Mellen Date Signed

Accompanying Personnel: T. A. Cooper
E. Lea, Jr.

Approved By: G. A. Belisic 9/25/87
G. A. Belisic, Chief Date Signed
Quality Assurance Programs Section
Division of Reactor Safety

SUMMARY

Scope: This routine, unannounced inspection was conducted in the areas of Instrumentation and Controls in the Maintenance and Start-up Departments.

Results: No violations or deviations were identified.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

J. Arias, Supervisor, Regulatory Compliance
*C. Baker, Plant Manager
*R. Earl, Quality Control Supervisor
*R. Hart, Licensing Engineer
*T. Finn, Training Superintendent
*D. Grandage, Operations Superintendent
*C. Kelly, Maintenance & Specialist Training Supervisor
J. Odom, Site Vice President
A. Ray, Nuclear Job Planning System Coordinator
*B. Sharp, I&C Production Supervisor
*R. Stone, Acting Quality Assurance Superintendent
K. York, Records Coordinator

NRC Resident Inspectors

*D. Brewer, Senior Resident Inspector
*J. Macdonald, Resident Inspector

*Attended exit interview

2. Exit Interview

The scope and findings were summarized on September 11, 1987, with those persons indicated in paragraph 1 above. The inspectors described the areas inspected and discussed in detail the inspection findings. No dissenting comments were received from the licensee. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspectors during this inspection.

3. Licensee Actions on Previous Enforcement Matters

This subject was not addressed in this inspection.

4. Unresolved Items

Unresolved items were not addressed during this inspection.

5. Start-up and Maintenance Instrumentation and Controls (I&C)
(61725, 38701, 37702)

Procedure Compliance (I&C)

The inspector reviewed the requirements for procedure usage and determined that verbatim compliance (with some allowed exceptions) is required. Twenty-seven Maintenance I&C work packages (along with the associated procedure data packages) and 20 Start-up I&C work packages were reviewed for completeness and accuracy.

No deviations (which were not accounted for in the work package) from the required procedures were noted. It was noted that the Start-up group does not work under plant procedures, but under their own guidelines which allow the use of work instructions in place of procedures. The inspector reviewed these packages to assure compliance. No instances of deviation from these requirements were noted. The packages were completed with all the appropriate signatures and reviews present.

Interviews were conducted with several members of Maintenance I&C and Start-up I&C. The inspector noted that the personnel are familiar with the requirements and appear to adhere to them. Deviations from the procedures/work instructions were logged into the package in the remarks section, along with reasons and resolutions.

Disposition of Work Packages

The inspector reviewed the administrative controls and requirements for the use of work packages. The inspector interviewed selected licensee employees to determine the extent of verbatim compliance with work packages and the associated procedures. During the interviews, the inspector noted that for situations where discrepancies existed between field wiring and the as-build drawings, if field supervision believed the as-build drawings were correct, the field wiring was modified to the configuration of the drawing without generation of the appropriate documentation. The inspector found no specific examples of this practice, but was ensured through discussions with plant management that if this problem existed, it would be corrected.

The inspector reviewed a selected sample of safety-related work packages for completeness, accuracy, and documentation of adherence to directions. In the cases where problems were encountered during the implementation of a work package, appropriate notations were made and corrective actions were implemented. No discrepancies were noted in the work packages reviewed.

Loop Calibrations

The inspector reviewed the procedures which govern loop calibrations and a selected sample of completed Loop Calibration packages which had been completed during the past 12 months. The inspector interviewed selected technicians and I&C Supervisors to determine management directives on the performance of loop calibrations. There were no problems encountered that were not properly documented. Management controls and directives were adequate. The finished packages were complete, accurate and appropriately controlled.

General I&C Areas

Several general areas were reviewed as they pertain to the I&C area. These included, but were not limited to:

- a. Drawing control/update program
- b. Results of QA/NRC audits
- c. Limitations applied to troubleshooting problems in the field
- d. Turnover of systems from Start-up I&C to Maintenance I&C

Both the Maintenance I&C and the Start-up I&C groups have noted a weakness in the timeliness of the issuance of revised plant drawings to the technician in the field. An example given, was the changes made to many panels as a result of the Safety Analysis System (SAS) modification. Normally, the revised drawing would not be issued until after the Plant Change Modification (PCM) had been completed and closed. The Maintenance I&C group has assumed responsibility for incorporating the existing changes into the drawings and completing modification documentation, assuming that the technicians have current drawings for use in the field. A supervisory level person coordinates the effort.

The inspector reviewed the Quality Assurance audits and Performance Monitoring reports (PMONs) since January 1, 1986 for I&C and start-up activities. No significant findings had been issued against these groups during this period.

The inspector reviewed the administrative controls placed on trouble shooting of plant components by the Maintenance I&C and Start-up I&C groups. The procedures governing Maintenance I&C troubleshooting appeared to adequately govern these activities. A review of several work packages concerning troubleshooting activities, revealed that the process resulted in accurate investigation and resolution of the documented problems. When an impasse was reached, an RTA (Request for Technical Assistance) was issued and the work halted until the problem was resolved.

A review of the process utilized in the turnover of systems from the Start-up I&C to the Maintenance I&C group revealed that completed work packages (along with engineering evaluations and reviews) were available and utilized in the process. No problems were noted with the process used in the turnover.

Replacement Parts

The inspector reviewed approximately ten packages completed per FP&L procedure 0190.15, Plant Changes and Modifications, which required the use of replacement parts. For the packages reviewed, it appeared that strict compliance was followed when a plant change or modification was required.

For each document reviewed, proper management approval was obtained and adequate engineering analysis and 10 CFR 50.59 Safety Evaluations were provided. The completed document contained a controlled plant work order for issued parts.

Continued procedural compliance should be adequate to assure all administrative requirements will be completed prior to installation of replacement parts.

Instruments & Controls Personnel Training

A review of the FP&L I&C training program was performed. The training provided to FP&L and contractor personnel appeared adequate. The inspector reviewed proposed modifications to the the I&C training program which were developed to enhance the existing program.

In addition to General Employee Training (GET), contract personnel were trained and tested on plant specifics before they were assigned to perform work. The additional training was not required by plant procedures, but was requested by I&C supervision. Training personnel informed the inspector that a procedure revision will be initiated to include this requirement in the contractor orientation program. These enhancements in the training programs have the potential of improving the program for both FP&L and contractor personnel.

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

