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CONWAY,W.F. Florida Power & Light Co.
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SUBJECT: Forwards response to Insp Repts 50-250/88-11 & 50-251/88-11 & notice of violation.

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SEPTEMBER 2 1988

L-88-384

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Reply to Notice of Violation
Inspection Report 88-11

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

Very truly yours,

For W. F. Conway
Senior Vice President - Nuclear

WFC/SDF/gp

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator,
Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

SDF.IR

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ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NO. 50-250, 50-251
IE INSPECTION REPORT 250-88-11 & 251-88-11

FINDING:

Technical Specification (TS) 6.8.1 requires that 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.

ANSI N18.7-1972, section 5.1.2 requires that procedures shall be followed.

Appendix A of Regulatory Guide 1.33, section 8.q., requires that specific procedures for surveillances of the Emergency Diesel Generators should be written.

Nuclear Chemistry Procedure NC-103, entitled Diesel Fuel Oil Inventory, Receiving Shipments and Periodic Sampling, revision dated April 14, 1988, section 8.3.4, outlines instructions for sampling the Diesel Fuel Oil Tank (through the transfer line). These instructions include opening valve 004 to obtain the diesel fuel oil sample and then reclosing and locking this valve after filling the sample container.

Contrary to the above, on May 29, 1988, after obtaining a sample from the Diesel Fuel Oil Tank, a chemistry technician locked closed valve 003, the suction valve for the Fuel Oil Transfer Pumps. Closure of valve 003 caused both Emergency Diesel Generators to be outside the design basis as described in the Final Safety Analysis Report (FSAR). FSAR, Section 8.2.3, states that transfer of fuel oil from the storage tank to the day tanks to maintain level is accomplished automatically. With valve 003 closed, manual operator action would be required to restore the day tank fuel oil level.

RESPONSE

1) FPL concurs with the finding.

2) The cause of the violation was personnel error in that the Chemistry Technician performed a valve manipulation not required by procedure. In addition, Chemistry Department Supervision did not provide adequate guidance and controls which in turn allowed the Chemistry Technician to misalign valve 70-003. The following factors contributed to this violation:

   - The procedure was reviewed prior to performing the work, but was not taken into the field while performing the work.
   - The procedure in use did not require signoff or verification of valve manipulations.
   - Chemistry Supervision did not completely understand and enforce the application of work controls.
   - Chemistry Supervision did not ensure the Technician was knowledgeable to

perform this task.
- The valve locking system did not provide the desired level of error prevention. The same key could be used to unlock both the sample valve (70-004) and valve 70-003.
- The consequences of closing valve 70-003 were not understood by the Technician due to the Technician's level of system knowledge.

3) a) Valve 70-003 was locked open and the operability of the diesel oil transfer system was verified by testing.

b) Safety related system walkdowns were performed to verify proper alignment.

c) The Technician involved was disciplined.

d) The responsibility for ensuring that Chemistry Technicians are qualified for the tasks they perform has been re-emphasized to the Chemistry Supervisors. A matrix of Technician qualification versus tasks has been developed to ensure that the Technicians are qualified for the tasks they perform.

e) The Chemistry Supervisor conducted a training session with the Chemistry Technicians emphasizing procedural compliance.

f) Procedure 0-ADM-650 "Chemistry Department Policy Procedure" was issued detailing requirements for Chemistry Department procedural compliance.

g) The Training Department issued Information Bulletin 88-02 to plant personnel. This bulletin details the administrative requirements for work controls and procedural compliance. Tests were given to selected individuals to determine the effectiveness of the training bulletin. The results from this testing were evaluated, and indicate that further training on work controls is required for first line supervisors.

h) The Chemistry Department training program was revised to include additional instruction on procedure usage.

4) a) Chemistry procedures that require manipulations of safety related valves will be reviewed and revised to require signoffs, or signoff and independent verification, as necessary.

b) Valves which are essential to safety related flow paths and are required to be locked in position will have their locks changed so that only Operations personnel will be able to manipulate the valves.

c) The Chemistry Department training program will be revised to provide instruction on selected valve types, valve position determination and valve identification.

d) Training on work controls will be implemented in New Employee Training and General Employee Training (GET).

e) Work control training will be incorporated into continuing training programs for plant staff.

f) System training will be incorporated into continuing training programs for Chemistry Technicians.

g) Training on work controls will be provided to first line supervisors per 3g above.

5) Full Compliance for item 3 above was achieved by August 31, 1988.

Full compliance for items 4a, 4b and 4c above will be achieved by December 31, 1988.

Full compliance for item 4d above will be achieved by September 3, 1988.

Full compliance for item 4e above will be achieved by December 15, 1988.

Full compliance for item 4f above will be achieved by September 27,1988.

Full compliance for item 4g above will be provided by September 30, 1988.