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

Report No.: 50-250/88-35

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

Docket No.: 50-250 License No.: DPR-31

Facility Name: Turkey Point

Inspection Conducted: November 14-18, 1988

Inspector: S. E. Sparks 12-1-88
S. E. Sparks Date Signed

Approved by: Frank Jape 12/1/88
Frank Jape, Section Chief Date Signed
Test Programs Section
Division of Reactor Safety

SUMMARY

Scope: This routine, unannounced inspection was conducted in the areas of review of engineered safeguards integrated testing, and review of previous enforcement matters.

Results: The inspector reviewed the controlling procedure for engineered safeguards integrated testing, which was found to adequately address the intended regulatory requirements. The procedure accounted for Engineered Safety Features (ESF) pumps which were in mini-flow or recirculation mode during the test. However, the procedure did not reflect recent FSAR updates with regard to emergency diesel generator loads, as two ESF pumps were found to specify slightly incorrect accident design loads. The licensee was receptive to procedural revisions to correct the discrepancy, and other minor procedural clarifications.

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

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

*J. W. Anderson, QA Regulatory Compliance Supervisor
J. Arias, Jr., Regulatory Compliance Supervisor
*A. Martinez, Electrical Lead Engineer
*J. S. Odom, Site Vice President
W. Raasch, System Engineer
*J. Rupp, System Engineer
S. Schaeffer, System Engineer
*G. Soloman, Compliance Engineer

Other licensee employees contacted during this inspection included craftsmen, engineers, operators, technicians, and administrative personnel.

NRC Resident Inspectors

*G. A. Schnebli, Resident Inspector
*T. F. McElhinney, Resident Inspector

*Attended exit interview

2. Complex Surveillance - Engineered Safeguards Test Review (61701)

The inspector reviewed the following procedures:

- 3-OSP-203, Engineered Safeguards Integrated Test, dated 10/27/88
- Operating Procedure 4304.3, Emergency Diesel Generator Eight Hour Full Load Test and Load Rejection, dated 11/1/88
- 0-PME-023.2, Emergency Diesel Generator (EDG) Electrical Maintenance, dated 5/20/88

The above procedures were reviewed to verify that:

- Appropriate plant conditions, prerequisites, precautions, and test equipment are provided to support the detailed sections of the test
- The procedures had received appropriate levels of management review and approval
- The above procedures were in accordance with Technical Specifications 4.8.1.d.1-7, which delineate various surveillance testing requirements and operability tests

- The provided acceptance criteria were in accordance with the above Technical Specifications and prescribed a qualitative or quantitative method for determining the results of the test

A review was also performed of the applicable portions of the FSAR with respect to EDG automatic loading sequences, specific load groups after EDG start, and design accident loads for specific equipment which actuate on a safety injection signal (SIS). The inspector verified that the procedure included sufficient preparations and prerequisites to insure that common auxiliary loads, i.e. boric acid heat tracing, control room air conditioners, battery chargers, and battery room air conditioners would sequence on during the test upon a SIS as indicated in Table 8.2-3 of the FSAR. The inspector also verified that specific equipment identified in Table 8.2-3 of the FSAR to auto-start during an SIS with loss of offsite power and two EDG available were identified in the controlling procedure. Based on the procedure review, the inspector had the following comments, with corresponding licensee resolution:

- The equipment accident load corrections, which are used to determine a corrected EDG load, were not consistent with FSAR Table 8.2-3 values. The corrected EDG load is a value which is compensated to reflect any equipment sequenced on during the test which may not be operating at design load. This could occur if pumps are in miniflow or recirculation alignment, which provides reduced pump flow rates and less KW output from the pump motor than would normally be seen when these pumps are at accident flow conditions. Specific equipment included the Residual Heat Removal (RHR) pumps, and the Containment Spray Pumps (CSP), which had a cumulative effect of increasing the auto-connected EDG load limit by 9 KW. The licensee stated that recent revisions to equipment loads sequenced onto the EDG during a SIS were not reflected in the latest revision to 3-OSP-203. The licensee committed to a procedure revision to reflect the proper values.

- The procedure identified three EDG load recordings, specifically from the digital recorder in the control room, readings derived from breaker measurements of current and potential, and from the control room console (an analog meter). However, the procedure did not identify which value was to be used in the final determination of EDG load limit verification. Licensee personnel stated that the values calculated from breaker measurements were used as an informational comparison with the digital meter recording in the control room. The licensee committed to a procedural revision to specifically state that the digital meter reading would be used in the final EDG load limit verification.

3. Action on Previous Inspection Findings (92701)

a. (Open) 250, 251/86-03, IE Bulletin 86-03: Potential Failure of Multiple ECCS Pumps Due to Single Failure of Air Operated Valve in Minimum Flow Recirculation Line

The inspector reviewed the engineering packages of PC/M 86-181 and 86-182, which provided the licensee's long term resolution of this item. The licensee's plant modification consisted of the replacement of the air actuators on the Safety Injection (SI) pump minimum flow recirculation line isolation valves with a Motor Operated Valve (MOV). Specifically, isolation valves 3-856A and 3-856B (Unit 3), and 4-856A and 4-856B (Unit 4) will be modified to contain Limitorque SMB-000 MOV's. At the time of the inspection, installation of the Unit 4 MOVs and associated electrical circuitry was still in progress, and Unit 3 installation was complete. The engineering package also specified that the isolation switches included a keylock mechanism (in the control room) which is needed to permit operation of the valves. However, these have not been installed, as deficiency report DR-824-88 was generated due to a discrepancy between the as-ordered and as-received part numbers. The licensee stated that resolution of DR-824-88 will be accomplished during the current Unit 4 refueling outage along with installation. In the interim, the licensee verifies with OSP-201.1, RCO Daily Logs, that the four isolation valves (two on each unit) are open and are not energized. The inspector informed the licensee that this item will be followed until completion of the MOV installation and resolution of the deficiency report.

b. (Open) VIO 250, 251/87-41-01, Failure to Perform Adequate Post Modification Testing Prior to Placing the Affected Components in Service. Part of the licensee's response to this violation was a revision to 3/4-OSP-203, Engineered Safeguards Integrated Test, which is to be completed during the current Unit 4 refueling. This item remains open.

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

4. Exit Interview

The inspection scope and findings were summarized on November 18, 1988, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings. The licensee did not identify as proprietary any of the material provided to or reviewed by the inspector during this inspection. Dissenting comments were not received from the licensee.