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U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO 3150-0104
EXPIRES 8/31/85

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Event: The Turkey Point Technical Specifications require a monthly position verification and an annual cycling of each valve in the flowpath of the Fire Protection Water System to demonstrate the operability of the flowpath. As the result of a programmatic technical specification operability review, which is one of the short term objectives of the Turkey Point Program for Improved Operation, an evaluation of Technical Specification 3.14.2 and 4.15.2 for Fire Protection Systems concluded that plant procedures did not include all flowpath valves which should be periodically visually verified for position and functionally cycled.

Cause of Event: Prior to the recent technical specification operability review, plant procedures were written to address the operability of post indicator valves and root valves, yard fire hydrants, fire hose cabinets, and spray and/or sprinkler valves. This was considered satisfactory to meet the Fire Protection System operability requirements of applicable plant technical specifications, when these were developed in 1981. Since 1981, various Appendix R modifications have been made to the Fire Protection Water System which has changed the configuration of the system flowpath and added new valves. Appendix R requirements and modifications have placed a greater emphasis on the importance of fire protection systems to plant safety. As a result, to enhance the demonstration of the operability of the Fire Protection System, the recent technical specification operability review was performed from a more conservative standpoint. Of the 27 additional flowpath valves recently identified during the operability review, about one half are root valves for flowpaths which do not protect safety related areas. With the exception of 1 or 2 valves, the remaining are new flowpath valves recently installed for Appendix R modifications. Therefore, the identification of additional Fire Protection Water System flowpath valves resulted from both a more conservative evaluation of the operability requirements of technical specifications and the new valves added during Appendix R modifications. THE ABSTRACT MUST STAND ALONE.

Corrective Actions: See page 2.

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<u>Co</u>	rrective Actions:																			
1)	The additional Fire Protect February 22, 1985, these values occidentation requirements.																			
2)	The valves have been incorporately Related Systems Flow		o the	plant	pro	cedu	re .	AP 0	103	.19,	Mo	onth	ly V	'eri:	fica	itic	n c	æ		

- These valves will also be incorporated into an existing maintenance procedure MP 15537.2, Fire Protection Equipment-Annual Surveillance, which will be revised to limit its scope to the existing requirements for cleaning and lubrication of valve stems for valves in the Fire Protection Water System flowpath. The surveillance cycling requirements will be removed from this maintenance procedure and incorporated into a new operations procedure.
- In conjunction with revisions to MP 15537.2, a new plant operations surveillance procedure will be written to require the annual cycling of all system flowpath valves, including those recently identified during the operability review.

The health and safety of the public were not affected. Similar occurrences: None.



MAR 2 5 1685 L-85-123

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

Gentlemen:

Re: Reportable Event 85-07

Turkey Point Unit 3

Date of Event: February 21, 1985

Fire Protection System - Flowpath Valve Surveillance

The attached Licensee Event Report is being submitted pursuant to the requirements of 10 CFR to provide notification of the subject event.

Very truly yours,

J. W. Williams, Jr. Group Vice President

Nuclear Energy

JWW/SAV/js

Attachment

cc: Dr. J. Nelson Grace

Harold F. Reis, Esquire

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File 933.1

PNS-LI-85-119v

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