

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 7, 1985

Docket Nos. 50-250
and 50-251

Florida Power and Light Company
ATTN: Mr. J. W. Williams, Jr.
Group Vice President
Nuclear Energy Department
P. O. Box 14000
Juno Beach, Florida 33408

Gentlemen:

SUBJECT: SAFETY SYSTEM FUNCTIONAL INSPECTION REPORT
50-250/85-32; 50-251/85-32

This letter forwards the report of the Safety System Functional Inspection performed by an NRC team from August 26-30 and September 9-13, 1985 involving activities authorized by NRC Operating License Nos. DPR-31 and DPR-41 for your Turkey Point facility. This inspection was conducted jointly by members of Region II and the Office of Inspection and Enforcement, by NRC contractors, and with assistance of the two Resident Inspectors. At the conclusion of the inspection, the findings were discussed at an exit meeting with those members of your staff identified in the appendix to the enclosed inspection report.

This NRC effort at Turkey Point represents a new inspection approach involving an assessment of the operational readiness and functions of a selected safety system. Particular attention is directed to the details of modifications and design control, quality of maintenance and surveillance, and adequacy of testing applicable to that safety system. At Turkey Point, the team selected the auxiliary feedwater system as described in the operating license.

The report included findings that may result in enforcement action, which would be the subject of subsequent correspondence. The report also addresses other observations and conclusions made by the inspection team. Section II of the report is a summary of the safety effects of the more significant findings on the operational readiness of Turkey Point's auxiliary feedwater system.

The inspection team exit discussion with your staff was held on September 13, 1985. On September 30, 1985 you submitted a letter to the Regional Administrator, Region II concerning the auxiliary feedwater system and the subject inspection. The following summarizes the Florida Power and Light (FPL) comments and NRC staff responses:

1. FPL Comment: Numerous positive steps, involving FPL senior management, have and are being taken to upgrade the auxiliary feedwater system at Turkey Point, which is a system shared between the two units of an early generation commercial nuclear power plant.

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NRC Staff Response: NRC recognizes the effort by FPL and the team reviewed details of the upgrade program. However, the team believes a number of the inspection issues should have been identified by FPL and incorporated into its upgrade program.

2. FPL Comment: FPL has installed a non-safety grade standby feedwater system, which employs two motor-driven feedwater pumps and which provides a capability in excess of the design requirements of the plant. The two pumps are provided with a backup, non-safety grade diesel generator power supply.

NRC Staff Response: The team determined at the time of the inspection there were no administrative controls or Technical Specification requirements in place to assure the availability on demand of this standby system. Consequently, the team concluded that it would be inappropriate to take into consideration the capabilities of this system during the team's analysis of the inspection findings. We understand that you recognize also the need for administrative controls over the standby feedwater system and that you have committed, in your September 30, 1985 letter, to provide Technical Specification requirements to establish those controls needed to ensure system operability.

3. FPL Comment: A safety-related nitrogen system is used as a backup to the non-safety related instrument air system to operate the auxiliary feedwater flow control valves. Control room operators typically shift the flow control valves from automatic to manual mode after an auxiliary feedwater actuation. With the flow control valves in manual mode, the nitrogen bleed down rate decreases, allowing in excess of 10 minutes for operator action to valve in a standby nitrogen bottle. This is in contrast to the 6-7 minutes available if the flow control valves remain in automatic.

NRC Staff Response: As discussed in section III.B.1 of the enclosed inspection report, the team determined that it cannot be assumed that control room operators would shift the flow control valves from automatic to manual mode within 6-7 minutes following an accident because: (1) some operators were trained to assume they had 15-20 minutes available to take action; and (2) applicable emergency procedures did not include requirements for the operators to shift the flow control valves to manual.

The Turkey Point facility has demonstrated past weaknesses in the areas of plant operations, maintenance, and quality assurance programs. These functional areas were rated Category 3 on your most recent Systematic Assessment of Licensee Performance (SALP) (July 1, 1983-October 31, 1984); plant operations was rated Category 3 in the previous SALP as well. As a result of these and other identified concerns, you implemented a Performance Enhancement Program (PEP) to improve regulatory and operational performance. Despite this additional management attention, the inspection team noted that performance



in the functional areas of maintenance, surveillance testing, and design changes and modifications has not markedly improved. The lack of timely resolution of these concerns has also been documented in recent NRC Region II inspection reports. You should, therefore, review and evaluate weaknesses identified in the enclosed report and take appropriate actions to improve management controls over licensed activities. Further, you should consider whether similar weaknesses apply to the operations and functions of other Turkey Point safety systems.

NRC staff understands that subsequent to the inspection exit meeting, you took prompt action to update procedures and training to address the team's safety concerns. However, we request that you respond to this office with your further actions resulting from this inspection within 60 days of the date of this report.

Sincerely,

James M. Taylor, Director
Office of Inspection and Enforcement

Enclosure:
Inspection Report Nos.
50-250/85-32 and 50-251/85-32

cc w/enclosure:
Mr. C. M. Wethey, Vice President
Turkey Point Nuclear Plant

Mr. C. J. Baker, Plant Manager
Turkey Point Nuclear Plant

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