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50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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WILLIAMS,J.W. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
THOMPSON,H.L. Office of Nuclear Reactor Regulation, Director (post 851125

SUBJECT: Requests addl info on Generic Ltr 85-15 re deadlines for compliance w/10CFR50.49.Application of Footnote 1 to evaluation of new info discussed on Pate 2 unclear.Guidance statement clarifying generic ltr points.

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TITLE: OR/Licensing Submittal: Equipment Qualification

NOTES:
OL:07/19/72 05000250
OL:04/14/73 05000251
OL:02/01/76 05000335
OL:04/06/83 05000389

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FLORIDA POWER & LIGHT COMPANY

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L-85-442

Mr. Hugh L. Thompson, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Thompson:

Re: Turkey Point Units 3 & 4
St. Lucie Units 1 & 2
Docket Nos. 50-250, 50-251, 50-335, 50-389
Generic Letter 85-15

Florida Power & Light has reviewed Generic Letter 85-15, Information Relating to the Deadlines for Compliance with 10 CFR 50.49, "Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants". Our review has indicated several areas where the Generic Letter is unclear to us and where further clarification may be warranted to provide guidance following initial qualification.

Specifically, we are concerned about the unclear application of footnote 1 to the evaluation of new information discussed on the second page of the letter. We fully understand the requirement for initial documented qualification of the basic component. We do not, however, consider that enforcement action is appropriate for minor documentation errors or for minor tested configuration inconsistencies which may come to our attention as a result of new information.

A second area of concern is the apparent conflict between the methods of resolution of EQ deviations and the methods of resolution of deviations per Criteria XVI (Corrective Actions) of 10 CFR 50, Appendix B. It is our opinion that the same programmatic actions should be required to resolve both types of deviations and that the actions would be as stated in FPL's Topical Quality Assurance Manual and Quality Procedures. This method gives us a reasonable, timely, and previously reviewed means to resolve problems which may arise from new EQ information.

Our Quality Procedures would require us to evaluate the safety significance of the deviation and take appropriate action. For items which are evaluated not to be a significant threat to the health and safety of the public, routine corrective action would be appropriate. Routine corrective action could include postponing inspection until plant conditions permit the inspection for suspected deviations in non-accessible areas. For items which are determined to have a significant safety impact, FPL would, of course, take whatever actions were required to resolve the deficiency.

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We have attached a guidance statement which we have provided to each of our plant sites. We see this statement as appropriate guidance to clarify the Generic Letter points.

At the request of Mr. McDonald and Mr. Sells of your staff, we have also provided a copy of a letter to FPL from Commissioner Bernthal, which discusses the application of the NRC enforcement policy to EQ maintenance items.

Should you have any questions regarding this information, please contact us.

Very truly yours,

J. W. Williams, Jr.
Group Vice President
Nuclear Energy

JWW/PLP:mls

Attachment

cc: Dr. J. Nelson Grace, Region II, USNRC
Harold F. Reis, Esquire
PNS-LI-85-394/2

ATTACHMENT

Re: Turkey Point Units 3 & 4
St. Lucie Units 1 & 2
Docket Nos. 50-250, 50-251, 50-335, 50-389
Generic Letter 85-15

EQUIPMENT QUALIFICATION GUIDANCE

In response to NRC IE Bulletin 79-01B field walkdowns were performed on Turkey Point Units 3 & 4 and St. Lucie Unit 1. These walkdowns verified that the installed equipment was indeed the equipment covered by the qualification documentation. The procedures for the walkdown required verified visual inspection of the nameplate data. This information was then compared to the documentation to establish a match. In the case of St. Lucie Unit 2, and any design modification performed by Engineering on any unit since the 79-01B response, the design for, procurement of, and documentation of the environmental qualification met the requirements for 10CFR50.49. In summary the baseline equipment identified within the scope of 10CFR50.49 did match the equipment installed in the plants.

A system to ensure continued qualification of the equipment has been put into place. The purpose of this position paper is to provide the FPL understanding of the requirements for inspecting and dispositioning any information that has been received after initial qualification. This will allow equipment qualification deviations to be treated in the same orderly manner as deviations from other NRC requirements.

When information becomes available which could have a negative impact on equipment qualification, the information shall be acted upon in a timely manner. The information shall be evaluated for applicability, and for determination of any required corrective action to be taken in accordance with Quality Procedure 16.1 (Corrective Action). Inspection of non-accessible equipment, where no documented deviation exists, normally will be done at the next outage. A documented deviation shall not, in and of itself, be the basis for equipment being considered inoperable. A documented engineering evaluation of the deviation shall be conducted to determine if continued operation is justified. The evaluation will consider data, judgement and probability in arriving at decisions regarding justification for continued operation.