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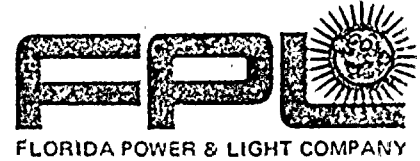
ACCESSION NBR: 8704150297 DOC. DATE: 87/04/10 NOTARIZED: NO DOCKET #
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 SENDER NAME: AUTHOR AFFILIATION
 WOODY, C. D. Florida Power & Light Co.
 RECIPIENT NAME: RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC ltr re violations noted in Insp Repts
 50-250/87-06 & 50-251/87 06. Corrective actions: Clearance
 Order 3-86-4-114 revised to reflect new clearance boundary.
 Extension of due date for Finding A to 870515 requested.

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 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

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APRIL 10 1987

L-87-162

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

Gentlemen:

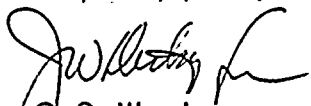
Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Inspection Report 87-06

Florida Power & Light has reviewed the subject inspection report and a response to finding B is attached. FPL is requesting a due date extension for finding A to May 15, 1987 to allow for additional time to review the circumstances surrounding the violation.

This extension has been discussed and concurred with by the NRC, Region II Staff on this date.

Should there be any questions, please contact us.

Very truly yours,


C. O. Woody
Group Vice President
Nuclear Energy

COW/SDF/gp

Attachment

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

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PDR ADOCK 05000250
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ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NO. 50-250, 50-251
IE INSPECTION REPORT 250-87-06 & 251-87-06

FINDING B:

Technical Specification (TS) 6.8.1 requires that written procedures and administrative policies be established 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 5.1.5. specifies that procedures shall be provided for control of equipment, as necessary, to maintain reactor and personnel safety and to avoid unauthorized operation of equipment. Section 5.1.2 of ANSI N18.7-1972 specifies that procedures shall be followed.

Administrative procedure 0103.4, In-Plant Equipment, Clearance Orders, Section 3.4.1, states in part that a clearance shall exist on a system when a component or system is isolated by valves from any source of pressure and is properly tagged with a danger tag to ensure the protection of personnel and equipment.

Contrary to the above, the licensee failed to implement AP 0103.4, in that lubricating water system valve 3-030 was not danger tagged by clearance order at a time when it constituted a system clearance boundary. This condition existed for an unknown period of time between December 3, 1986, and February 5, 1987.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was personnel error in that the requirements to update clearance order 3-86-4-114 were not followed when the clearance boundary was changed.
- 3) Upon identification of this discrepancy, clearance order 3-86-4-114 was revised to reflect the new clearance boundary.
- 4) A) This finding on clearance boundaries has been discussed with each maintenance department head and will be discussed at shop meetings. Also, this event will be discussed during the next series of safety meetings to re-emphasize the importance of compliance with AP 0103.4 and the consequences of not complying with the requirements of AP 0103.4.

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B) In addition this event will be reviewed by the Plant Advisory Training Board to determine if any additional training is required.

- 5) A) Full compliance with item 3 above was achieved on February 5, 1987.
B) Full compliance for item 4.a above will be achieved by April 30, 1987.
C) Full compliance for item 4.b above will be achieved by May 29, 1987

