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 FILE: 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

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SUBJECT: Responds to violations noted in Insp Repts 50-250/88-34 & 50-251/88-34.

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JANUARY 17 1989

L-89-19

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  
Reply to Notice of Violation  
Inspection Report 88-34

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

Very truly yours,

W. F. Conway  
Senior Vice President - Nuclear

WFC/RHF/gp

Attachment

cc: Malcolm L. Ernst, Acting Regional Administrator,  
Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

8901260054 890117  
PDR ADOCK 05000250  
Q PDC

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ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4  
DOCKET NOS. 50-250 AND 50-251  
IE INSPECTION REPORT 250-88-34 & 251-88-34

FINDING

10 CFR 50, Appendix B, Criterion V, and the licensee's accepted Quality Assurance Program FPL TQAR 1-76A, Rev. 11 of May 10, 1988, paragraph 5.1 in part state:

"Activities affecting quality shall be prescribed by documented instructions, procedures or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings...."

Florida Power and Light Administrative Procedure O-ADM-209, Equipment Tagging, dated June 14, 1988, provides the instructional guidance for establishing and maintaining an accurate, complete, and effective plant equipment identification program. Paragraph 5.2.1 of this procedure requires that unidentified equipment shall be temporarily identified by use of an Equipment Temporary Identification (ETI) Tag. Additionally, Enclosure (5) of this procedure requires that the Operations/Maintenance Coordinator shall have the unidentified equipment tagged with a metal tag and shall order a permanent fiberglass tag within 24 hours of notification of the problem.

Contrary to the above, Procedure O-ADM-209 requirements were not adhered to, in that, on November 1, 1988, NRC inspectors identified several Component Cooling Water System components which were not identified and further investigation determined that operations personnel were not utilizing ETI tags for temporary identification, nor were they tagging equipment with metal tags within 24 hours.

RESPONSE:

- 1) Florida Power and Light accepts the violation.
- 2) The reason for the violation was an inadequate procedure, in that O-ADM-209 imposed requirements which were not practicable based on the overall status of implementation of the equipment tagging program. The construction and maintenance work controls required to implement the equipment tagging program were not adequate and the increased burden on the operations program led to inability to implement the procedure requirements. Procedure O-ADM-209 was intended to assure maintenance of equipment identifying tags, however it was being used to implement the installation of equipment tags, as well as maintain existing tags.

A contributing cause was personnel error in that the personnel responsible for implementing the program were aware of the procedure weaknesses and did not initiate changes to correct the procedure and/or practices.

3) The corrective steps which have been taken and the results achieved are:

- a) Procedure 0-ADM-209 was reviewed to identify areas which need revision to assure the requirements can be implemented as described. Several areas of potential improvement have been identified, and a revision to the procedure has been submitted for review and approval.
- b) Work control programs which govern activities onsite were reviewed to identify activities which significantly impact the maintenance of the overall equipment identification tagging program. These programs are being revised or otherwise modified to address the implementation of the program.
- c) The individual responsible for the implementation of the operations equipment tagging program has been counseled regarding the importance of implementing procedures as written, or obtaining resolution of requirements which are not practicable.

4) The corrective steps which will be taken to avoid future violations are:

- a) The revisions to procedure 0-ADM-209 will be implemented following review and approval of the procedure changes.
- b) The training materials for new and continuing employee training programs are being reviewed to assure that the appropriate awareness of the equipment tagging program is included.
- c) Modifications are being made to the construction and maintenance work control programs to improve the implementation of the equipment tagging program and assure proper tag maintenance.

5) The date when full compliance will be achieved:

- a) The revision to 0-ADM-209 will be completed by January 31, 1989.
- b) The review of the training program to assure inclusion of the equipment tagging awareness training materials will be completed by February 28, 1989.
- c) Modifications to site work control programs will be completed by February 28, 1989.