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SUBJECT: Provides supplemental response to violation noted in Insp Repts 50-250/89-48 & 50-251/89-48.

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MARCH 2 6 1990

L-90-115
10 CFR 2.201

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

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Supplemental Reply to Notice of Violation
Inspection Report 89-48

On March 12, 1990, Florida Power & Light Company (FPL) discussed the response to the subject violation with NRC Region II staff. As a result of this discussion, FPL agreed to supplement the response.

The supplemental response is attached and is a complete replacement of the original response submitted by FPL letter L-90-81 dated February 27, 1990.

Very truly yours,

J. H. Goldberg
Executive Vice President
Nuclear Energy

JHG/GRM/sh

Attachment

cc: Stewart D. Ebneter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

IE01
1/1

ATTACHMENT

RE: Turkey Point Units 3 and 4
Docket Numbers 50-250 and 50-251
NRC Inspection Report 89-48

FINDING

10 CFR 50, Appendix B, Criterion V and the licensee's accepted Quality Assurance Program, FPL TQAR 1-76A, Section 5 require that activities affecting quality shall be prescribed by appropriate drawings.

Contrary to the above, two drawings, Operating Diagrams 5610-T-E-4501, Sheet 1, and 4510, Sheet 2, contained errors identified by NRC inspectors. These specific errors were promptly corrected and the licensee agreed to perform a further review to identify and correct any similar drawing errors.

RESPONSE

1. FPL concurs with the finding.

2. The Plant Operating Drawings (T-E series) were maintained by the Training Department and used as operator training documents until approximately 1979. At that time, the responsibility for maintaining the Plant Operating Drawings was transferred to the Engineering Department. A limited scope as built walkdown of the Plant Operating Drawings was initially performed during the turnover process; however, the drawing discrepancies noted by the NRC inspectors were not identified at that time. Use of the two subject Plant Operating Drawings since 1979 has not resulted in identification of the noted discrepancies by utility personnel. A discussion of the cited discrepancies is provided below.

   a. Drawing 5610-T-E-4501, Sheet 1, depicted the Residual Heat Removal (RHR) System hot leg suction line coming from the Reactor Coolant System (RCS) Loop C hot leg for both Units. This is correct for Unit 3, however, the RHR System hot leg suction line comes from the RCS Loop A hot leg for Unit 4. This discrepancy existed at the time the drawing was turned over to the Engineering Department in 1979. The associated Piping and Instrument Drawing (P&ID) correctly identifies the RHR hot leg suction line coming from RCS Loop C for Unit 3 and, by note, describes the RHR hot leg suction line coming from RCS Loop A for Unit 4. The cause for the continued existence of the drawing discrepancy was that the discrepant condition was not recognized by utility personnel.

   b. Drawing 5610-T-E-4510, Sheet 2, correctly identified the RHR System hot leg suction line as coming from RCS Loop C for Unit 3 and from RCS Loop A for Unit 4 within the flow arrows but had the direction of one flow arrow incorrectly drawn. Additionally, both of the flow arrows incorrectly referenced drawing 4510 instead of drawing

4501. The cause for the drawing discrepancies was an oversight by individuals responsible for drawing upgrades.

System walkdown guidelines for System Engineers were issued in June 1989. The drawing discrepancies noted by the NRC inspectors were on that part of the RHR System located inside the containment buildings. System walkdowns inside containment buildings would normally be performed during refueling outages. Neither Unit 3 nor Unit 4 entered a refueling outage between June 1989 and November 17, 1989. System walkdowns performed on systems outside the containment buildings since June 1989 have been effective in identifying and correcting drawing discrepancies as demonstrated below:

(1) The Plant Operating Drawings are used to verify the as-built configuration of a system. Drawing discrepancies and associated corrective measures are documented in the Monthly Walkdown Reports. Walkdowns have been performed monthly on accessible portions of approximately thirty (30) systems outside the containment buildings.

(2) Twenty-seven (27) Monthly Walkdown Reports associated with seventeen (17) systems have documented drawing discrepancies and the associated corrective measures.

3. Corrective steps which have been taken and the results achieved include:

a. The cited drawing discrepancies were corrected.

b. A memorandum was issued to Operations personnel re-emphasizing Administrative Procedure O-ADM-510, "Request for Engineering Assistance," as being the method for documenting drawing discrepancies.

4. Corrective steps which will be taken to avoid further violations include:

System walkdown guidelines for System Engineers have been further revised to clarify that system walkdowns include the entire system (i.e., accessible portions of the system inside and/or outside the containment building).

5. The date when full compliance was achieved:

a. Item 3.a was completed by November 17, 1989.

b. Item 3.b was completed on February 14, 1990.

c. Item 4 was completed on February 20, 1990.