



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA STREET, N.W.  
ATLANTA, GEORGIA 30323

Report Nos.: 50-250/89-29 and 50-251/89-29

Licensee: Florida Power and Light  
9250 West Flagler Street  
Miami, FL 33102

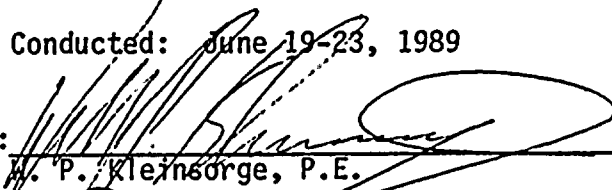
Docket Nos.: 50-250 and 50-251

License Nos.: DPR-31 and DPR-41

Facility Name: Turkey Point 3 and 4

Inspection Conducted: June 19-23, 1989

Inspectors:

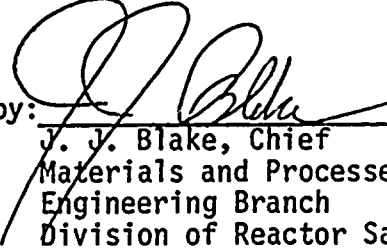
  
W. P. Kleinsorge, P.E.

June 29, 1989  
Date Signed

  
R. P. Carrion, P.E.

29 JUNE '89  
Date Signed

Approved by:

  
J. J. Blake, Chief  
Materials and Processes Section  
Engineering Branch  
Division of Reactor Safety

6/30/89  
Date Signed

SUMMARY

Scope:

This routine, announced inspection was conducted in the area of followup on licensee actions on previous inspection findings.

Results:

In the areas inspected, no violations or deviations were identified.

One unresolved item was identified related to the fail-safe status of the Main Steam Isolation Valves (MSIVs).

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OR ADOCK 05000250  
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## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

- \*J. Arias, Jr., Technical Assistant to the Plant Manager
- \*J. Cross, Plant Manager
- \*S. Day, Jr., Regulation and Compliance
- \*R. Earl, Quality Control (QC) Supervisor
- \*S. Franzone, Lead Nuclear Engineer JPN
- \*R. Gianfrancesco, Maintenance Superintendent
- \*S. Hale, Engineering Manager
- \*K. Harris, Vice President Turkey Point
  - G. Herbenick, Maintenance
  - A. Kasmir, Mechanical Engineer JPN
- \*V. Kaminkas, Technical Department Supervisor
  - M. King, Nuclear Engineer JPN
- \*E. Lyons, Acting Regulation and Compliance Supervisor
  - S. Rahmani, Civil Engineer JPN
- \*R. Reinhardt, Quality Assurance QA
- \*G. Smith, Services Manager
- \*B. Waldrep, Mechanical Engineer JPN
  - J. Weaver, Electrical Engineer JPN
- \*L. Wilson, Area QC Supervisor
- \*H. Young, Project Site Manager
- \*A. Zielonka, Site Engineering Supervisor

Other licensee employees contacted during this inspection included engineers, mechanics, technicians and administrative personnel.

#### Bechtel Power Corporation

M. Shekmer, Civil Engineer

#### NRC Resident Inspectors

- \*R. Butcher, Senior Resident Inspector (SRI)
- T. McElhinney, Resident Inspector (RI)
- G. Schnebli, Resident Inspector (RI)

\*Attended exit interview



2. Licensee Actions On Previous Inspection Findings  
a. Followup on Violations

- (1) (Closed) Violation 50-250,251/85-05-01: "Failure To Test Fail-Safe Valves In Accordance With The Code"

Florida Power and Light (FP&L) letters of response, dated April 5, 1985, December 6, 1985, May 2, 1986, and September 22, 1988, have been reviewed and determined to be acceptable by Region II. The inspectors held discussions with cognizant licensee personnel and examined the corrective actions as stated in the letters of response. The inspectors concluded that FP&L had determined the full extent of the subject violation, performed the necessary survey and follow-up actions to correct the present conditions, and developed the necessary corrective actions to preclude recurrence of similar circumstances. The corrective actions identified in the letter of response have been implemented.

As part of their corrective action to this violation, the licensee no longer considers these valves as fail-safe valves (IWV-3415). This change to their Inservice Testing (IST) program was transmitted to the Commission by FP&L Letter L-87-238, dated June 5, 1987. As of this writing, the following is not clear: what was the basis for the classification of these valves as "Fail-Safe" originally; was this criterion taken into consideration, when this change in classification was made; and is this change consistent with the the applicable regulations and the licensee's commitments. The licensee indicated that they would look further into this matter. Pending NRC examination of the licensee's review and the answering of the above questions, this matter will be identified as Unresolved Item 50-250,251/89-29-01: "Fail-Safe Status For MSIVs."

- (2) (Closed) Violation 50-251/86-06-02: "Failure To Provide Appropriate Acceptance Criteria For Inservice Testing Procedure"

FP&L letters of response, dated May 29, 1986, and September 12, 1988, have been reviewed and determined to be acceptable by Region II. The inspectors held discussions with cognizant licensee personnel and examined the corrective actions as stated in the letters of response. The inspectors concluded that FP&L had determined the full extent of the subject violation, performed the necessary survey and followup actions to correct the present conditions, and developed the necessary corrective actions to preclude recurrence of similar circumstances. The corrective actions identified in the letter of response have been implemented.



It should be noted that the licensee amended their program, including 14 pump testing procedures, to require reestablishment or reconfirmation of pump reference values when pumps are replaced, or when maintenance to the pumps might have affected the existing reference values. The changes mandate the reestablishment or reconfirmation of reference values, but do not provide any guidelines for the associated decision making process. Decisions are based on individual personnel experience and judgement. With no formal documented guidelines, the probability of lack of consistency and continuity is a real possibility.

- (3) (Closed) Violation 50-250,251/88-28-02: "Failure To Establish An Adequate Inspection Program For Component Cooling Water Heat Exchanger Replacement"

FP&L letter of response, dated December 21, 1988 has been reviewed and determined to be acceptable by Region II. The inspectors held discussions with cognizant licensee personnel and examined the corrective actions as stated in the letter of response. The inspectors concluded that FP&L had determined the full extent of the subject violation, performed the necessary survey and followup actions to correct the present conditions, and developed the necessary corrective actions to preclude recurrence of similar circumstances. The corrective actions identified in the letter of response have been implemented.

The inspectors noted minor discrepancies in some of the acronyms used in the procedure, "Preparation of Process Sheets and Installation Lists," (ASP-34), issued to rectify the violation. The comments were given to the licensee.

b. Followup on Unresolved Items (UNRs)

- (1) (Closed) UNR 50-250,251/86-13-01: "Adequacy Of Design Capacities Used For Installed Wej-It Concrete Anchor Bolts"

The inspectors held discussions with licensee cognizant engineers which disclosed that the previously envisioned study has taken longer to initiate because the source of the data, another nuclear utility and its A/E, treated the information as proprietary and was reluctant to release it. The licensee has reviewed the information and preliminary findings indicate that all Wej-It concrete anchors meet the functionality criteria committed to under IE Bulletins 79-02 and 79-14. Based on these findings and their evaluation, UNR 50-250,251/86-13-01 is hereby closed.



However, to assure that the program is continued as outlined in the schedule presented to the inspectors, the following is opened: Inspector Followup Item (IFI) 50-250,251/89-29-02, "Evaluation of Design Capacities Of Installed Wej-It Concrete Anchor Bolts."

- (2) (Closed) UNR 50-250,251/86-15-01: "Check Valve Testing Adequacy"

This item questioned the adequacy of the testing of check valves in the IST program. As indicated in NRC Report 50-250,251/86-15-01, the licensee indicated that they would re-evaluate this issue. To date, inspectors could not find any documented objective evidence of the indicated re-evaluation. Generic Letter No. 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," requires the licensee to review their program in this area among others. Therefore, this item will be closed in favor of the Generic Letter.

- (3) (Closed) UNR 50-250,251/87-52-01: "Discrepancies On As-Built Drawings And Calculations Of Piping Systems For IEB's 79-02 And 79-14"

The inspectors reviewed the status of resolving the numerous discrepancies previously identified in Inspection Report No. 50-250,251/88-24 and followed up in Inspection Report No. 50-250,251/89-01. All Unit 4 items have been completed via PC/M Nos. 88-208, -209, -210, and -211. Unit 3 items will be worked during the next refueling outage. The PC/M's associated with this effort are being revised to incorporate final comments and include PC/M Nos. 88-369, -370, -371, -372, -373, -374, -375, -376, and -377. They are being tracked by the licensee's Integrated Schedule (IS) via MOD No. 1238. Because the licensee has completed the work for Unit 4 and has committed to completing the Unit 3 items during the next refueling outage and is tracking them on the IS, this item is hereby closed.

- (4) (Closed) UNR 50-250,251/88-04-01: "Specification Of Inspection Requirements"

This item concerned the fact that the licensee mis-specified the inspection requirements for weld end preparations on ASME Class 1 piping and components. The licensee determined that no mis-inspections had occurred. Revision 7 to FP&L Standard No. M-3.50, "Inspection and Non-Destructive Examination Requirements Nuclear and Non-Nuclear," was issued to prevent any possible future mis-inspections. It should be noted that this change was made and issued on June 21, 1989, even though the need was identified in NRC Report 50-250,251/88-28 in August 1988. The inspectors have no further questions related to this matter. This matter is considered closed.





- (5) (Closed) UNR 50-250,251/88-04-02: "Objective Quality Evidence (OQE) for Copper Analysis"

This item concerns the fact that the licensee was unable to provide Objective Quality Evidence (OQE) of copper analysis for carbon steel welding filler materials as required by American Society of Mechanical Engineers, Boiler & Pressure Vessel (ASME B&PV) Code Section III, Subsection NB, Paragraph NB-2432.2. The licensee performed an exhaustive record review and determined that: there were only three heats of material involved, all from the same vendor; the missing OQE was the result of isolated personnel error and; none of the filler material was used in an application within the envelope of Regulatory Guide 1.99, "Effects of Residual Elements on Radiation Damage to Reactor Vessel Materials," or ASME B&PV Code Paragraph NB-2432.2(a). The material supplies have been exhausted, therefore, there is no possibility of future use in a Regulatory Guide 1.99 or NB-2432.2(a) application. The inspectors have no further questions. This matter is considered closed.

- (6) (Closed) UNR 50-250,251/89-01-01: "Pipe Support Discrepancies Between Field Conditions And As-Built Drawings"

The inspectors reviewed the eight items identified as having discrepancies and found that all had been closed or were in final engineering evaluation. The resolutions adopted by the licensee appear to be reasonable and acceptable. Therefore, this item is hereby closed.

c. Followup on Inspector Followup Items (IFI)

- (1) (Closed) IFI 50-250,251/86-06-01: "Accountability Procedures"

This item was closed in NRC Inspection Report 50-250,251/87-31.

- (2) (Closed) IFI 50-250,251/87-31-01: "Thread Engagement Final Report"

In response to violation 50-250,251/85-09-01, the licensee conducted an inspection of pressure boundary bolting in 13 systems. The Violation was closed in NRC Report No. 50-250,251/87-31, dated July 9, 1987, which opened this followup item for NRC review of the final summary of results. As reported in Report 50-250,251/88-22, August 1988, the licensee had not scheduled the necessary rework.



The licensee has completed the rework on Unit 4 and has entered the rework for Unit 3 on the Five Year Plan. The licensee made a verbal commitment to complete the Unit 3 rework by the end of the refueling outage following the current Unit 3 fuel cycle. The inspectors have no further questions relative to this matter. This matter is considered closed.

- (3) (Open) IFI 50-250,251/87-52-02: "Maintenance Procedures for Piping Systems"

The inspectors held discussions with the licensee's cognizant engineer concerning the progress being made on establishing the Nonsafety-Related Pipe Support Inspection Program. ADM-718, "Component Support Preventive Maintenance Inspection Program," has been written and approved and a draft schedule of component supports, by system, is being developed. However, the licensee has not implemented the program and is reconsidering its structure and departmental responsibilities. Therefore, until the procedures and program are finalized, including clear lines of duties and responsibilities, this item remains open.

- (4) (Closed) IFI 50-250,251/89-01-02: "Piping and Pipe Support Deficiencies"

The inspectors reviewed the engineering-related deficiencies listed on Table 3 of NRC Report No. 50-250,251/89-01 and discussed them with cognizant licensee engineers. All seven items listed have been addressed and the required work has been completed, except for Item No. 1, for which the licensee is awaiting a vendor replacement part to take the place of the presently-installed pin. An engineering evaluation determined that the existing pin is adequate and does not reduce the capacity of the support on which it is used. Therefore, this item is closed.

- (5) (Closed) IFI 50-250,251/89-01-03: "Piping System Maintenance"

The inspectors reviewed the four items referenced in Table 4 of NRC Report No. 50-250,251/89-01 with licensee cognizant engineers. Each item has been appropriately addressed and the required work/maintenance has been performed. Therefore, this item is hereby closed.

- (6) (Open) IFI 50-250,251/89-01-04: "Spent Fuel Pool Cooling System"

The Spent Fuel Pool Cooling System has been upgraded to ensure that its cooling function will be maintained throughout a seismic event. Several modifications were made to accomplish this upgrade, including the addition of a thermal expansion loop to existing piping in order to reduce the thermal loads on the



pump nozzles, the modification and addition of pipe supports to accommodate the revised seismic loads, and the replacement of the manual transfer switch for the Spent Fuel Pit Pumps by one which is seismically qualified. The inspectors performed a visual physical inspection of the system to verify that the above referenced modifications had been completed. The thermal expansion loop has been installed, the manual transfer switch has been changed, and the pipe supports have been modified (including some which have been deleted and others which are completely new). However, some discrepancies were noted during the walkdown and discussed with the licensee. The licensee concurred with the findings and took steps to remedy the problem by issuing Discrepant Field Condition (DFC) No. DFC-89-192 for support H-694-05 and DFC-89-193 for support H-694-06. In addition to these discrepancies, various analytical qualifications and evaluations must be reviewed during subsequent inspections. Therefore, this item remains open.

#### d. Observations

The inspectors were able to close 12 out of 14 items examined, which is a significant improvement compared with the lack of success documented in NRC Report 50-250,251/88-22 of approximately ten months ago, covering many of the same items. However, many of the packages submitted to the inspectors, for closeout, at this inspection, were not complete and had to be returned for more information. Although the inspectors notified the licensee in advance (June 15, 1989) of this inspection, specifying the items to be considered, and the licensee has had approximately ten months to work on these packages, since the last inspection, some packages were not available to the inspectors for the first three days of the inspection. While there has been some improvement in the licensee's addressing of previous inspection findings, the inspectors consider the licensee not to be responsive to NRC initiatives.

### 3. Exit Interview

The inspection scope and findings were summarized on June 23, 1989, with those persons indicated in paragraph 1. The inspectors described the areas inspected and discussed in detail the inspection findings indicated below. No dissenting comments were received from the licensee. The licensee made verbal commitments related to discrepancies on as-built drawings and calculations for IE Bulletins 79-04 and 79-14 discussed in paragraph 2b(3), and thread engagement discussed in paragraph 2c(2).

(Open) Unresolved Item 50-250,251/89-29-01: "Fail-Safe Status For MSIVs"-Paragraph 2a(1)

(Open) Inspector Followup Item 50-250,251/89-29-02: "Evaluation of Design Capacities of Installed Wej-It Concrete Anchor Bolts," Paragraph 2b(1)



#### 4. Acronyms and Initialisms

ANSI	American National Standards Institute
ASME	American Society of Mechanical Engineers
B&PV	Boiler and Pressure Vessel
DFC	Discrepant Field Condition
FP&L	Florida Power and Light
IE	Inspection and Enforcement
IEB	Inspection and Enforcement Bulletin
IFI	Inspector Followup Item
IST	InService Testing
MSIV	Main Steam Isolation Valves
NDE	Non-Destructive Examination
NRC	Nuclear Regulatory Commission
PC/M	Plant Changes/Modifications
OQE	Objective Quality Evidence
QA	Quality Assurance
QC	Quality Control
UNR	Unresolved



