P.O. BOX 529100 MIAMI, FL 33152

FLORIDA POWER & LIGHT COMPANY

June 30, 1981
L-81-262

Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250, 50-251
IE Inspection Report 81-10

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

There is no proprietary information in the report.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/ah

Attachment

cc: Harold F. Reis, Esquire

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250, 50-251
IE Inspection Report 81-10

FINDING:

Technical Specification 6.8.1 requires written procedures and administrative policies be established, implemented, and maintained for safety-related equipment. Administrative Procedure 0190.19, Control of Maintenance on Nuclear Safety-Related Equipment, requires that work on safety-related equipment be accomplished per plant work order.

Contrary to the above, Administrative Procedure 0190.19 was not followed in that on April 13, 1981, the back-up nitrogen supply system for the pressurizer power operated relief valves was found to be isolated and a properly authorized Plant Work Order had not been initiated for the work which apparently caused the valves to be shut. The Unit was in a shutdown condition when the valves were found closed.

RESPONSE:

(1-1) FPL concurs with the finding.

(1-2) The reason that a safety-related Plant Work Order had not been initiated for this particular work evolution, was that our original Q List did not have this system specified. The isolation of the system, change out of the bottles, and restoring the system to service had been conducted through the use of blanket Plant Work Orders. Our revised Q List was approved and implemented on April 6, 1981. Mechanical Maintenance Department Supervision had not reviewed the new Q List with all department personnel who would have responsibility to insure that this list be consulted prior to initiating a Plant Work Order.

(1-3) As corrective action, when this problem was discovered, the valves which had been closed to change out the N_2 bottles were reopened to the system and a test was conducted to insure operability prior to filling and venting the plant.

(1-4) As corrective action to avoid further problems, all personnel in mechanical maintenance department who are responsible for reviewing the Q List to insure that work on safety related systems are accomplished through a specific Plant Work Order have been made aware of the new revised list.

(1-5) Full compliance was achieved on June 19, 1981.

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

Robert E. Uhrig, being first duly sworn, deposes and says:

That he is Vice President of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this said document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.

Robert E. Uhrig

Subscribed and sworn to before me this

30 day of June, 1981

Cheryl I. Fredrick

NOTARY PUBLIC, in and for the County of Dade, State of Florida

My commission expires: Notary Public, State of Florida at Large My Commission Expires October 30, 1983 ~~Bonded thru Maynard~~ Bonding Agency