P. O. BOX 013100, MIAMI, FL 33101

FLORIDA POWER & LIGHT COMPANY

January 14, 1977
L-77-23

Central Files
50-250
251

Mr. Norman C. Moseley, Director, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
230 Peachtree Street, N. W., Suite 1217
Atlanta, Georgia 30303

Dear Mr. Moseley:

RE: IE:II:CEA
50-250/76-15
50-251/76-15

Florida Power and Light Company has reviewed the subject inspection report, and has found that it does not contain any proprietary information.

Very truly yours,

Robert E. Uhrig

Robert E. Uhrig
Vice President

REU/MAS/pm

cc: Robert Lowenstein, Esquire

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
230 PEACHTREE STREET, N.W. SUITE 818
ATLANTA, GEORGIA 30303

DEC 23 1976

In Reply Refer To:
IE:II:CEA
50-250/76-15
50-251/76-15

Florida Power and Light Company
Attn: Dr. R. E. Uhrig, Vice President
of Nuclear and General
Engineering
P. O. Box 013100
9250 West Flagler Street
Miami, Florida 33101

Gentlemen:

This refers to the inspection conducted by Mr. C. E. Alderson of this office on November 8-12, 1976, of activities authorized by NRC Operating License Nos. DPR-31 and DPR-41 for the Turkey Point 3 and 4 facilities, and to the discussion of our findings held with Mr. J. R. Benson at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observations by the inspector.

Within the scope of this inspection, no items of noncompliance were disclosed.

Two new unresolved items resulted from this inspection and are identified in Section III of the summary of the enclosed report. These items will be examined during subsequent inspections.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you believe to be proprietary, it is necessary that you submit a written application to this office requesting that such information be withheld from public disclosure. If no proprietary information is identified, a written statement to that effect should be submitted. If an application is submitted, it must fully identify the bases for which information is

claimed to be proprietary. The application should be prepared so that information sought to be withheld is incorporated in a separate paper and referenced in the application since the application will be placed in the Public Document Room. Your application, or written statement, should be submitted to us within 20 days. If we are not contacted as specified, the enclosed report and this letter may then be placed in the Public Document Room.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Very truly yours,

F. J. Long, Chief
Reactor Operations and Nuclear
Support Branch

Enclosure:
IE Inspection Report Nos.
50-250/76-15 and 50-251/76-15

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
230 PEACHTREE STREET, N.W. SUITE 818
ATLANTA, GEORGIA 30303

IE Inspection Report Nos. 50-250/76-15 and 50-251/76-15

Licensee: Florida Power and Light Company
4200 Flagler Street
P. O. Box 013100
Miami, Florida 33101

Facility Name: Turkey Point 3 and 4
Docket Nos.: 50-250 and 50-251
License Nos.: DPR-31 and DPR-41
Category: C/C

Location: Dade County, Florida

Type of License: W PWR-760 Mwe, 2200 Mwt

Type of Inspection: Routine, Announced

Dates of Inspection: November 8-12, 1976

Dates of Previous Inspection: September 30 - October 1, 1976

Inspector-in-Charge: C. E. Alderson, Reactor Inspector

Accompanying Inspectors: W. H. Bradford, Reactor Inspector
J. D. Martin, Reactor Inspector
H. L. Whitener, Reactor Inspector

Other Accompanying Personnel: H. C. Dance, Acting Chief
Nuclear Support Section
(November 11-12, 1976)

Principal Inspector: M. V. Sinkule 12/21/76
M. V. Sinkule, Reactor Inspector — Date
Reactor Projects Section No. 2
Reactor Operations and Nuclear Support Branch

Reviewed by: M. Seidel for 12-22-76
R. C. Lewis, Chief — Date
Reactor Projects Section No. 2
Reactor Operations and Nuclear Support Branch

SUMMARY OF FINDINGS

I. Enforcement Items

None

II. Licensee Action On Previously Identified Enforcement Action

Not within the scope of this inspection.

III. New Unresolved Items

76-15/1 Control of Jumpers and Lifted Leads

The licensee's administrative controls in this area do not address the requirements of 10 CFR 50.59. (Details II, paragraph 3.a)

76-15/2 Administrative Controls for Maintenance

The administrative controls do not provide requirements consistent with Section 5.3.5 of ANSI N18.7-1972. (Details III, paragraph 2)

IV. Status of Previously Reported Unresolved Items

Not within the scope of this inspection.

V. Unusual Occurrences

None

VI. Other Significant Findings

The inspectors identified thirty-one items involving the establishment or implementation of administrative controls which require further action to satisfy the applicant's commitments or assure that applicable requirements will be satisfied. The applicant's actions on these items will be reviewed and evaluated during future inspections. (Details I, paragraph 3-7; Details II, paragraphs 2 and 3; Details IV, paragraphs 2-4)

VII. Management Interviews

An interview was held at the conclusion of the inspection on November 12, 1976, with Messrs. J. Benson, H. Yaeger and J. Vessely, and other members of the site and corporate staffs. The inspection findings, as presented in the Details of this report, were discussed.

DETAILS I

Prepared by: C. E. Alderson, Reactor Inspector 12-17-76
Date
Nuclear Support Section
Reactor Operations and Nuclear
Support Branch

Dates of Inspection: November 8-12, 1976

Reviewed by: H. C. Dance, Acting Chief 12-20-76
Date
Nuclear Support Section
Reactor Operations and Nuclear
Support Branch

1. Individuals Contacted

Florida Power and Light Company (FPL)

J. Vessely - Manager of Quality Assurance
A. Siebe - Assistant Manager of QA, Operations
R. Spooner - QA Engineer
R. Tucker - QA Engineer
D. Jones - QC Supervisor
D. Haase - Technical Supervisor
K. York - Supervisor, Document Control
J. Hays - Plant Superintendent, Nuclear
G. Jones - Shift Supervisor

2. Introduction

The purpose of this inspection was to determine whether the licensee had established and implemented the administrative controls necessary to assure compliance with the Technical Specifications and implementation of the Quality Assurance Program for Operations described in the FPL Topical Quality Assurance Report. In each of the areas inspected the inspectors first determined whether adequate administrative controls were available and then the degree of implementation of these controls was determined by review of selected activities and records, and interviewing licensee personnel.

The following licensee documents are referred to by abbreviation in this report as indicated in parentheses following the document description.

a. Florida Power and Light Company Topical Report No. FPLTQAR 1-76A (TQAR)

b. FP&L Quality Procedures (QP x.x)

c. Plant Turkey Point Administrative Procedures (AP XXXX.X)

3. QA/QC Administration

The licensee's administrative controls for overall management of the quality assurance and quality control programs was reviewed to determine whether it included: (1) definition or identification of the structures, systems, components, documents and activities to which the program applies; (2) methods and requirements for review, approval, revision, distribution and recall of QA/QC procedures; and (3) assignment of responsibility for performing a periodic review of the overall QA program and methods for modifying the program when necessary. The program was evaluated for conformance to Criteria I, II, VI, XVI and XVIII of Appendix B to 10 CFR 50 and Sections 1, 2, 6 and 16 of the TQAR. The following documents were reviewed:

QP 1.1 (Rev. 1), Control of the Quality Assurance Program
QP 2.2 (Rev. 2), Revision of the Topical Quality Assurance Report
QP 2.3 (Rev. 2), Preparation and Revision of Quality Assurance Procedures
QP 2.4 (Rev. 1), Preparation and Revision of Quality Assurance Instructions
QP 16.3 (Rev. 0), Corrective Action for Operating Nuclear Generating Plants
Quality Assurance Department Manual (dtd. 10-1-76)
AP 0190.1 (dtd. 7-8-76), Quality Assurance Program
AP 0190.13 (dtd. 10-1-76), Corrective Action

Within the areas inspected one discrepancy was identified. Section 8.1 of AP 0190.13 implies that adverse conditions which can be corrected on the spot need not be reported nor documented. This is not consistent with the requirements of Section 16 of the TQAR.

4. Audits

The licensee's administrative controls were reviewed to verify that a program to control audits had been established to include: definition of subjects to be audited and schedules for conducting audits; definition of administrative channels for assuring corrective actions when deficiencies are identified; definition of distribution requirements for audit reports and responses; requirements for the use of written procedures or checklists in the performance of audits; and assignment of responsibility for overall management of the audit program. Overall management of the audit program includes: determining adequacy of audit personnel qualifications and training; determining when reaudits are required; assuring independence of auditors; issuance of audit reports; preparation of long range plans and schedules; and periodic review of the audit program to determine its status and adequacy. The program was evaluated for conformance to Criteria I and XVIII of Appendix B to 10 CFR 50: Technical Specifications 6.5.2.8 and 6.5.2.10; and Sections 2 and 18 of the TQAR. The following documents were reviewed:

QP 1.1 (Rev. 1), Control of Quality Assurance Program
QP 2.3 (Rev. 2), Preparation and Revision of Quality Assurance Procedures
QP 2.4 (Rev. 1), Preparation and Revision of Quality Assurance Instructions
QP 2.5 (Rev. 2), Quality Assurance Indoctrination and Training
QP 2.9 (Rev. 0), Qualification of QA Audit and QC Inspection Personnel
QP 16.1 (Rev. 0), Corrective Action for Department Audits
QP 16.3 (Rev. 0), Corrective Action for Operating Nuclear Generating Plants
QP 18.1 (Rev. 2), Conduct of Quality Assurance Department Quality Audits
QP 18.2 (Rev. 3), Scheduling of Quality Assurance Department Audit Activities
Quality Assurance Department Manual (dtd. 10-1-76)

Implementation of the program was inspected by a review of the current long range audit plan, current quarterly audit schedule, and the audit checklists and reports for two recent audits.

Within the areas inspected, the following discrepancies were identified:

a. Section 18.1 of the TQAR states that "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program . . ." While audit plans and schedules listing broad functional areas to be audited had been developed, they did not provide sufficient detail to ensure that the audit program will be adequate in either scope or depth. Further, the administrative controls did not provide guidance as to the necessary scope or depth of individual audits which would assure that a particular functional area would be "comprehensively" audited.

b. Based on a review of Audit Report QAO-PTP-76-09-111 dealing with implementation of the TQAR, it appeared that the bases for determining acceptability of audit items did not support the auditor's findings of "satisfactory" in some cases. As an example, an audit item required that the auditor determine that a program had been developed to assure availability of drawings and distribution to the site or work location. The audit requirement was signed-off and accepted as satisfactory with the notation that a particular administrative procedure contained a similar procedural requirement. The inspector stated that a statement in a procedure which states that something shall be done does not constitute a method or procedure for assuring that it is done.

5. Safety Committee Activity

The licensee's administrative controls governing activities of the Plant Nuclear Safety Committee (PNSC) and the Company Nuclear Review Board (CNRB) were reviewed to verify that they inclued: assignment of authority and responsibility for conducting independent reviews and the mechanism for initiating these reviews; specification of review group membership and methods for appointing alternates; requirements for meeting frequency, committee quorum, and preparation and distribution of minutes and other records; provisions and methods for followup action to resolve deficiencies identified; and establishment of lines of communications with other personnel and FPL organizations. The controls were evaluated for conformance to Criteria I, II, V, XVI and XVII of Appendix B to 10 CFR 50; Technical Specifications 6.5.1 and 6.5.2; and Sections 1, 2, 5, 16 and 17 of the TQAR. The following documents were reviewed:

QP 5.1 (Rev. 1), Operating Plant Procedures
QP 16.1 (Rev. 0), Corrective Action for Department Audits

QP 16.3 (Rev. 0), Corrective Action for Nuclear Generating Plants
AP 0110.4 (dtd. 4-28-76), Plant Nuclear Safety Committee - General Procedures
AP 0190.14 (dtd. 8-23-76), Document Control and QA Records
Company Nuclear Review Board Operating Procedure (dtd. 12-30-75)

Implementation of the program was inspected by a review of the PNSC meeting minutes for the period from July 16, 1976 to November 1, 1976, and of CNRB meeting minutes for the period from July 30, 1976 to October 25, 1976, to verify that the meetings had been conducted, and minutes prepared and distributed, in accordance with the administrative controls.

Within the areas inspected, the only discrepancy identified concerned the apparent misplacement of requirements for PNSC meeting minutes and assignment of responsibilities in the CNRB Operating Procedure.

6. Document Control

The licensee's administrative controls were reviewed to determine whether a program for document control had been established to include: preparation, review, approval, and issuance of new and revised drawings and procedures; control of outdated procedures and drawings; control of standing and special orders; preparation, correction and review of operating logs and records; and assignment of responsibilities for program implementation. The administrative controls were evaluated for conformance to 10 CFR 50.59; Criteria II, V and VI of Appendix B to 10 CFR 50; Technical Specifications 6.5.2.7, 6.8.1 and 6.8.2; Sections 2, 5 and 6 of the TQAR; and Sections 5.1 and 5.3 of ANSI N18.7-1972. The following documents were reviewed:

QP 5.1 (Rev. 1), Operating Plant Procedures
QP 6.1 (Rev. 0), Document Control - Distribution and Revision of Drawings, Specifications and Procedures
QP 6.2 (Rev. 1), Document Control - Interdepartmental
QP 6.3 (Rev. 1), Document Control for Operations
QP 6.4 (Rev. 0), FPL Drawing Control
QP 6.5 (Rev. 0), PTP Drawing Control

AP 0109.1 (dtd. 4-16-76), Preparation, Revision and Approval of Procedures
AP 0109.3 (dtd. 7-8-76), On the Spot Changes to Procedures
AP 0123.1 (dtd. 9-28-76), Maintaining Operating Logs and Records
AP 0190.14 (dtd. 8-23-76), Document Control and QA Records
AP 0190.25 9dtd. 7-16-76), Compliance Review Program

Implementation of the program was inspected by selecting ten recently issued plant procedures and verifying that each was reviewed, approved and issued in accordance with the administrative controls. The working files were also inspected to verify that they contained the proper revision for those procedures selected. Additionally, five "On the Spot Changes" were selected from the OTSC Log and PNSC meeting minutes were reviewed to verify that the changes had been reviewed and approved as required by Technical Specifications.

Within the areas inspected, the following discrepancies were identified:

a. Section 8.7 of AP 0109.1 allows the use of "Letters of Instruction" and "Departmental Procedures," for safety-related matters; however, administrative controls governing the content, preparation, review, approval, distribution and recall of such documents had not been established as required by Section 6 of the TQAR.

b. The administrative controls do not address the requirements of 10 CFR 50.59 with regard to changes in procedures which change modes or methods of operation described in the FSAR, nor do they address the requirements of Technical Specification 6.5.2.7 as it applies to revisions to procedures and the accompanying safety evaluations.

c. The word "should," and the phrases "as soon as practical and in a timely manner" are used in AP 0190.14 in such a manner that implementation of the procedural requirements is dependent on the interpretation of such statements by the user. This does not assure adequate implementation of the intent of the procedure.

d. The method for distributing procedure revisions which is prescribed in AP 0190.14 does not assure that the current approved version of a procedure is used to perform an activity.

The licensee's method of distributing "advanced copies" appears to accomplish this; however, such distribution is not addressed nor controlled by the administrative controls.

e. The index or status report for chemistry procedures did not include the current revision number or date for each procedure as specified in AP 0190.14.

f. AP 0123.1 contains what appear to be contradictory statements, in that steps 8.2.1 and 8.2.2 state that "These instructions indicate the minimum log book entries" while the lists of types of information following these statements are both prefaced by the statement that "Log books should contain. . ."

g. AP 0190.14 addresses distribution of new or revised procedures but does not address control or disposition of the outdated procedures as required by Section 6.2.5 of the TQAR.

h. The QP 6 series of procedures provides administrative controls for corporate offices - site interfaces with regard to drawing control; however, administrative controls for drawing distribution and control at the site had not been developed. It was noted that a procedure title and number was identified in the Plant Procedure index but the instruction had not been issued.

i. Failure to update "as-built" drawings following implementation of design changes and modifications was originally identified in IE Report No. 50-260/75-11 and has been addressed in several subsequent inspection reports. The licensee has administrative controls to assure that future design changes and modifications are incorporated into the as-built drawings and is actively pursuing its program of incorporating past design changes and modifications. The status of this program will be reviewed during future inspections.

7. Tests and Experiments

The licensees administrative controls were reviewed to verify that a program to control special testing and experiments had been established to provide: methods for requesting tests and experiments; requirements for preparation, review and approval of written procedures; requirements for written safety evaluation and determination of whether an unreviewed safety question

exists; and assignment of responsibility to assure implementation. The program was evaluated for conformance to 10 CFR 50.59; Criterion I, V and XI of Appendix B to 10 CFR 50; Technical Specifications 6.5.1.6b, 6.5.7a and c, and 6.8.1; and Sections 5 and 11 of the TQAR. The following documents were reviewed:

QP 3.4 (Rev. 1), Plant Changes and Modifications for Operating Plants
QP 11.2 (Rev. 0), Test Control - Operation
QP 11.4 (Rev. 1), Control Program
QP 17.1 (Rev. 0), Retention of Quality Assurance Records
AP 0109.1 (dtd. 4-16-76), Preparation, Revision and Approval of Procedures
AP 0190.22 (dtd. 1-6-76), Changes, Tests and Experiments

Implementation of the program was inspected by selecting three tests being conducted by the licensee and verifying that they were reviewed, approved and conducted in accordance with the administrative controls.

Within the areas inspected, the following discrepancies were identified:

a. For those tests reviewed it was determined that written procedures for conducting the test had been provided; however, the administrative controls did not appear to require that tests and experiments be conducted in accordance with written procedures as required by Technical Specification 6.8.1 which, by reference to Section 5.3 of ANSI N18.7-1972, requires that the plant will be operated in accordance with written procedures.

b. AP 0190.22 states that a brief description of each change, test or experiment will be retained in the Document Control Files; however, to satisfy the requirements of 10 CFR 50.59 and Section 16 of the TQAR which implements Criterion XVII of Appendix B to 10 CFR 50 the actual procedures used, the documented results and records of reviews and evaluations must also be retained.

c. AP 0190.22 addresses only those changes, tests and experiments which are determined not to involve an unreviewed safety question. Administrative controls have not been provided for processing and disposition of those which may, or do involve an unreviewed safety question.

d. Certain statements or phrases used in steps 5.3.3, 5.5.1 and 7.1 of AP 0190.22 need clarification to prevent misinterpretation by the user. As presently written, these steps appear to exclude certain changes, tests or experiments from the requirements of the procedure.

e. Based on a review of several approved test procedures, it appeared that AP 0190.22 was being used as a mechanism for implementing design changes and modifications, on a trial basis, to determine feasibility and acceptability of such changes before processing a Plant Change/Modification as required by QP 3.4. It was noted that in some cases the trial period was as long as one year. It does not appear that this practice is consistent with the requirements of Section 3 of the TQAR and QP 3.4.

DETAILS II

Prepared by: W. H. Bradford 12/20/76
W. H. Bradford, Reactor Inspector Date
Nuclear Support Section
Reactor Operations and Nuclear Support Branch

Dates of Inspection: November 8-12, 1976

Reviewed by: H C Dance 12/20/76
H. C. Dance, Acting Chief Date
Nuclear Support Section
Reactor Operations and Nuclear Support Branch

1. Individuals Contacted

Florida Power and Light Company (FP&L)

K. Beatty - Training Supervisor
L. Clawson - Training Supervisor, Electrical Maintenance
R. Toland - Training Supervisor, Mechanical Maintenance
W. Steele - Training Supervisor, I&C Maintenance
J. Moore - Operations Superintendent
D. Bradford - Nuclear Plant Supervisor
G. Jones - Shift Supervisor
K. York - Supervisor, Document Control
T. Bishop - Chief Electrician
P. Bennett - Plant Results Assistant
K. Baker - QA Engineer

2. Qualification and Training

The licensee's administrative controls were reviewed to verify that: (1) minimum education, experience and training requirements had been established for members of the plant staff performing safety-related activities; and (2) that the training and retraining programs necessary to satisfy the training requirements had been developed and implemented. The program was evaluated for conformance to 10 CFR 50.54; Criterion II of Appendix B to 10 CFR 50; 10 CFR 55; Technical Specification 6.4.1; ANSI N18.1-1971; and ANSI N45.2.6-1973. The following documents were reviewed:

QP 2.5 (Rev. 2), Quality Assurance Indoctrination and Training
AP 103.9 (dtd. 2-27-76), Facility Staff Qualification
AP 301 (dtd. 3-8-74), Licensed Operator Requalification Program
AP 302 (dtd. 12-10-74), Training Reports - Licensed Operators
AP 303 (dtd 6-24-74); Nuclear Operator and Nuclear Turbine Operator Training and Retraining Program
AP 304 (dtd. 9-17-75), Plant Training

Implementation of the program was inspected by review of personnel records to determine that personnel met the established minimum qualifications and had received the required training.

Within the areas inspected, one discrepancy was identified. Completed design changes/modifications and administrative procedures had not been incorporated into the training/retraining program for the mechanical maintenance section. The licensee stated that this training would be initiated immediately. The inspector stated that accomplishment of such training would be verified during a future inspection.

3. Design Changes and Modifications

The licensee's administrative controls were reviewed to verify that a program for the control of design changes and modifications had been established to include: (1) methods for preparation, verification, review (including safety evaluations when required), and approval of design changes; (2) methods for controlling implementation of design changes, deviations from approved design change documents and testing subsequent to implementation; (3) methods for incorporating design changes into plant procedures and training; and (4) assignments of responsibility for assuring implementation. Methods for controlling temporary modifications and bypasses were also reviewed. The program was evaluated for conformance to 10 CFR 50.59; Criteria III and VI of Appendix B; Sections 3, 5, 6, 11 and 16 of the TQAR; Sections 3,5 and 6 of ANSI N18.7-1972; Section 4 of ANSI N45.2-1971; and ANSI N45.2.11-1974. The following documents were reviewed:

QP 3.1 (Rev. 1), Design Review, Evaluation and Control
QP 3.2 (Rev. 0), Identification and Control of Design Interfaces
QP 3.4 (Rev. 1), Plant Changes and Modification of Operating Plants
QP 3.6 (Rev. 0), Control of FPL Originated Design
QP 6.2 (Rev. 1), Document Control-Interdepartmental

QP 6.4 (Rev. 0), FPL Drawing Control
AP 103.3 (dtd. 11-5-75), Control and Use of Jumpers and Disconnected Leads
AP 190.15 (dtd. 7-22-74), Plant Changes and Modifications

Implementation of the program was inspected by review of four completed design change packages to verify that the changes had been initiated, reviewed, approved and implemented in accordance with the above listed controls. Licensee personnel responsible for classifying design changes as safety-related or non-safety-related were interviewed to determine their understanding of the administrative controls. Implementation of the controls for temporary jumpers and lifted leads was determined by review of the Jumper Log and by direct observation of selected safety-related system cabinets.

Within the areas inspected, the following discrepancies were identified:

A. Controls for temporary modifications such as jumpers and lifted leads did not assure that a review of the safety-related function would be performed prior to implementation as required by 10 CFR 50.59. The controls also failed to address the need for functional testing subsequent to installation or removal of temporary jumpers on lifted leads. The licensee stated that the administrative controls concerning temporary jumpers and bypasses would be reviewed in the light of the requirements of 10 CFR 50.59. This is designated as Unresolved Item 76-15/1.

B. During the review of completed plant changes/modifications it was noted that PC/M form No. 2 was not being completed in conformance with AP 190 15 in that certain items were not being initialed. The licensee stated that this form is under revision and that the revised form will be in use by January 1, 1977.

DETAILS III Prepared by: J. D. Martin, Reactor Inspector 12/31/76 Date
Nuclear Support Section
Reactor Operations and Nuclear Support Branch

Dates of Inspection: November 8-12, 1976

Reviewed by: H. C. Dance, Acting Chief 12/21/76 Date
Nuclear Support Section
Reactor Operations and Nuclear Support Branch

1. Individuals Contacted

Florida Power and Light Company (FPL)

R. Spooner - QA Engineer
K. York - Supervisor, Document Control
P. Bennett - Plant Results Assistant
D. Jones - QC Supervisor
H. Ainsworth - Assistant Maintenance Superintendent
R. Wallace - QA Engineer
E. Baker - QA Engineer
A. Abbott - QC Procedure Coordinator
C. Reynolds - QC Document Control
T. Knox - Maintenance Supervisor
L. Hess - GEMS Planner
R. Cook - QC Supervisor, I&C
E. Keller - QC Technician
C. Coles - I&C Specialist
D. Nichols - I&C Maintenance Supervisor

2. Maintenance

The licensee's administrative procedures and QA program documents were reviewed to verify that a program to control corrective and preventive maintenance of safety-related equipment had been established to include: (1) requirements and methods for initiating requests for maintenance, and subsequent review, approval, scheduling and implementation of requests; (2) requirements for use of procedures; (3) controls for replacement parts and materials used; (4) requirements for conducting inspection of maintenance activities and functional testing subsequent to maintenance and methods to

assure implementation; (5) requirements for maintaining records of maintenance activities which include approvals, identification of test and measuring equipment used and identification of persons performing the activities; (6) methods for assuring that work is performed by qualified personnel, and in the case of special processes, using qualified procedures; (7) methods to control plant equipment during maintenance; and (8) assignment of responsibility for assuring program implementation. The program was evaluated for conformance to criterion XVI of Appendix B to 10 CFR 50; Section 5 of ANSI N18.7 - 1972; Section 2, 10 and 17 of ANSI N45.2 - 1971; and Sections 2.2, 2.8, 9.2, 10.3, 10.4, 11.2, 16.3, 17.1 of the TQAR.

The following documents were reviewed:

QP 2.7 (Rev. 0), Classification of Material and Equipment

QP 2.8 (Rev. 0), Cleanliness Control Methods

QP 9.2 (Rev. 1), Control of Special Processes During Operating Phase

QP 10.3 (Rev. 2), Inspection and Surveillance of Maintenance Activities, Operations and Fuel Handling

QP 14.1 (Rev. 0), Inspection, Test and Operating Status During Plant Operations

AP 0103.4 (dtd. 8/20/75), In-Plant Equipment Clearance Orders

AP 0190.13 (dtd. 5/12/75), Corrective Action

AP 0190.19 (dtd. 7/31/75), Control of Maintenance on Nuclear Safety-Related Systems

AP 0190.62 (dtd. 5/30/76), Requirements for Procedure and Welder Qualifications

AP 0190.67 (dtd. 7/31/74), Welding and Cutting Safety Procedure

AP 0190.70 (dtd. 5/30/75), Inspection of Nuclear Safety-Related Maintenance Activities

8 Completed Plant Work Orders (Form 1784)

Implementation of the program was inspected by review of three completed routine maintenance activities and five preventive maintenance activities to ascertain that they conformed to the program requirements. Additionally the inspector interviewed two operations and four maintenance personnel to determine their understanding of the administrative controls and their assigned responsibilities.

Within the areas inspected, one discrepancy was identified. Section 5.3.5(3) of ANSI N18.7 - 1972 requires that instructions be provided for post-maintenance checkout and return to service. Additionally, Section 5.3.3 of the Standard and Appendix A of Regulatory Guide 1.33 both require that instructions for changing modes of operation of safety-related systems be included in system procedures. The administrative controls provided in AP 0103.4 and AP 0190.19 do not: (1) provide guidance as to what constitutes adequate post-maintenance testing; and (2) include adequate instructions to assure that the system is returned to the specific standby or operating status prescribed in system procedures.

This item is designated as Unresolved Item 76-15/2.

3. Surveillance Testing and Calibration Control

The licensee's administrative controls were reviewed to ascertain that a program relating to control and evaluation of surveillance testing had been established to include: (1) requirements for developing and maintaining test schedules; (2) requirements for performing tests in accordance with approved, written procedures; (3) formal methods for review, evaluation and reporting of deficiencies, failures and malfunctions identified during testing; (4) calibration of safety-related components not identified in Technical Specifications; and (5) assignment of responsibilities to assure program implementation. The program was evaluated for conformance to Criteria XI of Appendix B to 10 CFR 50; Section 4 of the Technical Specifications; and Section 6.4 of ANSI N18.7 - 1972. The following documents were reviewed:

QA 12.2 (Rev. 1), Calibration Control of Installed Plant Instrumentation and Control Equipment

AP 0190.16 (dtd. 9/20/75), Scheduling and Surveillance of Periodic Tests and Checks Required by Technical Specifications

GPP 0204.2 (dtd. 4/16/76), Schedule of Periodic Tests, Checks, Calibration and Operating Evaluations

Implementation of the program was inspected by reviewing twenty surveillance (periodic) tests and calibration of five safety-related plant instruments to verify that they conformed to the established requirements. The inspector also interviewed personnel responsible for management of the program to determine the understanding of their assigned responsibilities.

Within the areas inspected, there were no discrepancies identified.

4. Test and Measuring Equipment

The licensee's administrative controls were reviewed to ascertain that the program of control included: (1) establishment of an equipment inventory with calibration frequencies; (2) methods to identify calibrated equipment and control out-of-calibration equipment; (3) requirements and methods for evaluating validity of previous calibrations performed using test equipment subsequently found to be out-of-calibration; (4) assignment of responsibilities to assure implementation of the program. The program was evaluated for conformance to criterion XII of Appendix B to 10 CFR 50; Section 5.3.6 of ANSI N18.7 - 1972 and Section 12.0 of the TQAR. The following documents were reviewed:

QP 12.1 (Rev. 2), Calibration and Control of Measuring and Test Equipment

AP 0190.9 (dtd 6/16/73), Control of Measuring and Test Equipment

Implementation of the program was inspected by reviewing a sampling of ten pieces of test and measurement equipment to verify they conformed to the established requirements. also interviewed personnel responsible for management of the program to determine the understanding of their assigned responsibilities.

Within the areas inspected, there were no discrepancies identified.

DETAILS IV

Prepared by: H. L. Whitener 12/17/76
H. L. Whitener, Reactor Inspector / Date
Nuclear Support Section
Reactor Operations and Nuclear Support Branch

Dates of Inspection: November 8-12, 1976

Reviewed by: H C Dance 12/20/76
H. C. Dance, Acting Chief / Date
Nuclear Support Section
Reactor Operations and Nuclear Support Branch

1. Individuals Contacted

Florida Power and Light Company (FPL)

K. York - Record Coordinator, QC
E. Wertz - Plant Administrative Assistant
D. Jones - QC Supervisor
R. Reinhardt - QC Engineer
E. Keller - QC Technician, I&C
R. Jacob - Field Supervisor, I&C
R. Tucker - QA Engineer
R. Spooner - QA Engineer
M. Fowler - Area Stores Supervisor
J. Cleveland - QAP Engineer
A. Seike - Assistant Manager of QA, Operations

2. Procurement

The licensee's administrative controls were reviewed to determine that a program to control the procurement of safety-related equipment and materials had been established to include: (1) review and approval of procurement documents; (2) review and approval of changes made to procurement documents or to original specifications; (3) evaluation, selection and use of vendors and suppliers to ensure the supplier QA program is consistent with that of the licensee; and (4) documented verification of supplier QA programs and activities. The program was evaluated for conformance with

requirements of Criteria IV and VII of Appendix B to 10 CFR 50; Section 4 and 7 of the TQAR; Section 5.3.9 of ANSI N18.7-1972; Section 5 and 8 of ANSI N45.2-1971 and ANSI N45.2.13-1974 (Draft). The following were reviewed:

QP 4.1 (Rev. 1)	Control of Requisitions and The Issuance of Purchase Orders for Spare Parts, Replacement Items, and Services
QP 4.2 (Rev. 0)	Evaluation of Contractor's Bid Technical
OP 4.4 (Rev. 1)	Review of Requisition on Purchasing Agent for Items and Services Other Than Spare Parts
QP 7.3 (Rev. 0)	Establishing and Maintaining The QA Approved Suppliers List
QP 7.4 (Rev. 0)	Evaluation of Contractor's Supplier's Quality Assurance Program and Procedures
QP 7.5 (Rev. 0)	Source Surveillance of Suppliers and Offsite Contractors Activities
QI 7-QAD 2 (Draft)	Method for Suppliers Evaluations
QI 6-QAD 2 (Draft)	Maintenance of (Suppliers) QA Manuals
QI 17-QAD 3 (Draft)	Preparation, Control, Maintenance and Storage of QAP Audit Files and History Files
AP 0190.1 (dtd 7-8-76)	QA and QC Program and Organization At Turkey Point
AP 0190.4 (dtd 9-8-76)	Procurement Document Control
AP 0190.12 (dtd 8-23-76)	Nonconforming Materials, Parts or Components

AP 0190.63 (dtd 10-8-73)	Welding Filler Metal Control Procedure
OP 4709.1 (dtd 2-26-76)	HEPA and Adsorber MHA Air Cleaning System Filter Purchase and Storage

Checklists for supplier QA evaluation:

Design Control Checklist
Material Suppliers Checklist
Supplier Quality Control System Evaluation Checklist

Supplier Re-evaluation Audit Schedule

Implementation of the licensee's program was inspected by review of the procurement documentation for a representative sampling of safety-related items to verify that the licensee maintained traceability of items, used qualified suppliers and included technical and quality requirements on the procurement documents.

In general, it appeared that the licensee's implementing procedures did not contain sufficient detail to assure that the requirements of Section 4 of the TQAR will be satisfied. In fact, it was noted that AP 0190.4, the site-level implementing procedure contained less detail than QP 4.1, the corporate-level document which establishes the specific requirements for procurement document control. Specific inadequacies in the implementing procedures include:

a. The procedures do not specify who must "originate" or "review" purchase requisitions and thus do not assure that the individuals performing these activities are technically competent to render the judgements required concerning inclusion of requirements for special testing, analyses or documentation, technical requirements, etc.

b. The procedures do not identify the "applicable regulatory requirements, design bases, code requirements and other requirements" referred to in Section 4 of the TQAR, and thus do not assure knowledge of such requirements for inclusion in purchase requisitions.

c. The procedures state that the Requisition on Purchasing Agents (RPA's) are not QA records and need not be retained; however, without this document the requestor has no way to verify that the item received is exactly what he requested.

d. QP 4.1 and AP 0190.4 do not provide sufficient criteria for determining when a requisition may be handled as "no QC Required."

e. The administrative controls do not establish a procedure for processing requisitions when original design specifications are changed.

3. Receipt, Storage and Handling

The licensee's administrative controls were reviewed to determine that a program for control of receipt, storage and handling of safety-related equipment and materials had been established to include: (1) requirements for conducting and documenting receipt inspections to verify conformance with procurement documents; (2) requirements for identifying, segregating and properly storing items received; (3) requirements for identifying, isolating and processing nonconforming items and notification of affected organization; (4) requirements for providing special handling and environmental protection when required; and (5) requirements for assignment of responsibility to assure program implementation. The program was evaluated for conformance with the requirements of Criteria VII, XIII and XV of Appendix B to 10 CFR 50; Section 7, 8, 13 and 15 of the TQAR; Section 5.3.9 of ANSI N18.7 - 1972; Sections 8, 9, 14 and 16 of ANSI N45.2-1971; and Sections 5 and 6 of ANSI N45.2.2. The following documents were reviewed:

QP 7.1 (Rev. 1)	Receipt Inspection of Nuclear Safety-Related Materials, Parts, and Components for Operating Plants
QP 8.1 (Rev. 0)	Identification and Control of Materials, Parts and Components at The Plant Site
QP 13.2 (Rev. 0)	Handling, Storage and Shipping of Materials, Parts and Equipment During Plant Operation
QP 15.2 (Rev. 0)	Control of Nonconforming Material, Parts, or Components - Operating Plants
AP 0190.72 (dtd 9-3-76)	Receipt Inspection, Identification, and Control of Nuclear Safety-Related Parts, Materials, and Components

AP 0190.12 (dtd 8-23-76)	Nonconforming Materials, Parts, or Components

Stores Department - Quality Instruction Manual (Controlled Document)

Implementation of the program was inspected by review of procurement documents, receipt inspection records and by direct observation of the Stores warehouse and materials and equipment in storage.

Within the areas inspected, the following discrepancies were identified:

a. The administrative controls prescribing handling and storage procedures appeared to address only the stores warehouse. Equivalent controls, required by Section 7 and 13 of the TQAR and Section 5 and 6 of ANSI N45.2.2-1971, had not been established for other storage areas being used by the licensee.

b. The administrative controls established in QP 15.2 and AP 190.12 for release of nonconforming items did not clearly define the sequence for review, evaluation, approval and release of such items for "limited use" or acceptance "as is".

4. Records

The licensee's administrative controls were reviewed to verify that a program for records management had been established to include (1) identification of quality records; (2) receipt, storage, control and retrievability of quality records; and (3) assignment of responsibility for implementation of the program. The program and control of the document storage area were evaluated for conformance with the requirements of Section 6.10 of the Technical Specifications; Criterion XVII of Appendix B to 10 CFR 50; Section 17 of the TQAR; and ANSI N45.2.9-1971. The following documents were reviewed:

QP 17.1 (Rev. 0)	Retention of Quality Assurance Records
QP 6.3 (Rev. 1)	Document Control for Operations Transfer of Record
AP 0190.14 (dtd 8-23-76)	Document Control and Quality Assurance Records
AP 0190.1 (dtd 7-8-76)	Quality Assurance and Quality Control Program and Organization at Turkey Point

Within the areas inspected the following discrepancies were identified:

a. The licensee had not developed and implemented a receipt control system consistent with the requirements of Section 17 of the TQAR and Section 4.3 of ANSI N45.2.9-1974.

b. The administrative controls did not prescribe the method and necessary approval for disposing of superseded records as required by Section 5.3 of ANSI N45.2.9-1974.

c. The licensee was retaining Abnormal Occurrence Reports as required; however, these records did not appear in the index of QA records.

d. The licensee does not classify the Plant Work Order (PWO) as a QA record. Since the PWO's provide a record of review and approvals and maintenance activities, and in some cases the only record of malfunctions and corrective actions, it appears that they should be classified as QA records and handled accordingly.

e. With regard to the requirements of Section 5.6 of ANSI N45.2.9-1974 that records be afforded the equivalent protection of NFPA Class A, four hour minimum rated facility, Appendix C to the TQAR states that FPL will meet the requirements of the NFPA Code, utilizing those portions which indicate that insulated protection equipment with a rating below Class A may be used if certain building and occupancy conditions are met. QP 17.1 provides specific construction requirements for permanent storage facilities; however, these requirements do not address the fire rating of the facilities or containers. Additionally, the procedure does not provide requirements for temporary storage facilities. AP 0190.14 provides instructions that records not stored in Document Control shall be stored in file cabinets having an underwriters minimum rating of one hour and provides only that records stored in Document Control be in containers or on shelving. The use of such storage equipment is allowed by the NFPA Code; however, such use is based on controlled use of the building in which the equipment is housed and the licensee has not established the administrative procedures to assure proper use and occupancy.