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July 20, 1983 L-83-414

Mr. James P. O'Reilly Regional Administrator, Region II U. S. Nuclear Regulatory Commission 101 Marietta Street NW, Suite 2900 Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 & 4 Docket Nos. 50-250 & 50-251 Inspection Report 83-11

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/cab

Attachment

cc: Harold F. Reis, Esquire

# ATTACHMENT

RE: Turkey Point Units 3 and 4 Docket Nos. 50-250 & 50-251 IE Inspection Report 83-11

#### FINDING:

Technical Specification 6.8.1 requires that written procedures be established and implemented.

Contrary to the above, the licensee did not install a ball-lock pin on the moveable lift arm of the yoke for the spent fuel cask as required by procedure 16702.3 (Step 8.2.7). Consequently, on April 20, 1983, when lifting the cask from the Unit 3 spent fuel pool the fixed yoke arm slipped from the cask trunnion leaving the cask supported by only the moveable arm.

### **RESPONSE:**

- 1. FPL concurs with the finding.
- The reason for the finding was that the use of the substitute pin (five-eighths inch threaded rod) for the standard pin (one-inch ball lock pin) did not receive adequate prior review.
- 3. Immediate corrective action was to remove the empty cask from the spent fuel pit and install an acceptable substitute, a one-inch pin, with locking pins, which had been fabricated from stainless steel.
- 4. Corrective action taken to prevent further findings was to change the cask handling procedure, OP 16702.3, to specifically require and document by signoff that a one-inch diameter pin is used.
- 5. Full compliance will be achieved by July 31, 1983, when the revised procedure will have been issued.

### **DEVIATION A:**

The FPL letter L-81-382, dated September 4, 1981, in an attachment, commits to a program of crane inspection, testing and maintenance satisfying the requirements of ANSI B30.2-1976.

Contrary to the above procedure, MP 16701.1 describes rope inspection in a singleline which does not implement the detailed inspection points or rejection criteria given in several paragraphs of the standard. No procedure implements the visual and physical measurements of hook conditions required during frequent inspections under ANSI B30.2.

# RESPONSE:

As corrective action, changes to Maintenance Procedure 16701.1 were reviewed and approved by the Plant Nuclear Safety Committee so that the procedure now meets the commitments in our letter of September 4, 1981, for crane inspection, testing and maintenance. The procedure will be issued by August 17, 1983.

# **DEVIATION B:**

Generic Letter 81-07 required that licensees in responding to NUREG-0612 describe all special lifting devices and operate, inspect and maintain them in accordance with ANSI N14.6-1978.

Contrary to the above, the licnesee did not describe the lifting yoke for the spent fuel cask in its responses to the generic letter. Also, the yoke does not meet the standard requirements in that the load limit is not clearly marked on the yoke.

### RESPONSE:

- FPL concurs with the deviation in that the lifting yoke for the spent fuel cask was not adequately addressed in our responses to Generics Letter 81-07. The NAC-1 lifting yokes are required by design drawing to be stamped with a load capacity of 52,000 lbs. This stamp is centered on the yoke lifting bale. Because the yoke is fabricated from carbon steel it is painted prior to use in contamination areas. This painting was most probably the reason why the load rating stamp was not "clearly" marked on yoke, however, the unique design of the yoke effectively precludes its use for the lifting of general loads.
- The yoke is rented in conjunction with the cask and has been returned to the vendor.
- 3. FPL responses to Generic Letter 81-07 will be supplemented to adequately address on the cask/yoke compliance with ANSI N14.6. Region II will be copied on this correspondence with NRR.
- 4. The supplemental response for Generic Letter 81-07 will be submitted to the NRC by October 7, 1983.