

USNRC REGION II  
ATLANTA, GEORGIA

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June 18, 1982  
L-82-251

Mr. James P. O'Reilly,  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250, 50-251  
IE Inspection Report 82-21

Florida Power and Light Company has reviewed the subject inspection report and a response is attached. Finding B is still being evaluated and is not addressed in our response. Several alternatives for corrective action for this finding are being considered because of the potentially large impact that corrective action may have. We will provide our response to Finding B by July 14, 1982.

There is no proprietary information in the report.

Very truly yours,

A handwritten signature in cursive script that reads "Robert E. Uhrig".

Robert E. Uhrig  
Vice President  
Advanced Systems and Technology

REU/PLP/mbd

Attachment

cc: Harold F. Reis, Esquire

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PDR ADOCK 05000250  
Q PDR

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4  
DOCKET NOS. 50-250, 50-251  
IE INSPECTION REPORT 82-21

FINDING A:

Technical Specifications 6.8.1 requires that procedures be implemented.

Contrary to the above, step 8.2 of Operating Procedure 2500.1, Heat Tracing System - Normal Operation (Revision 1/22/80) was not followed in that circuits 2, 7, 9, 51, 56, 57, 62, 67, 68 and 69 were in the blocked position without operating condition justification as indicated by the plant Technical Department review concluded on February 26, 1982.

RESPONSE:

1. FPL concurs with the Finding.
2. The finding was caused by inadequate compliance to procedural requirements.
3. As corrective action the recorder switches for the circuits listed were returned to their proper positions.
4. The Operations Supervisor held shift meetings to stress the need for strict compliance to procedures, accurate log readings, and noting all exceptions on logs. Additionally the Nuclear Operator's critical heat tracing circuit log sheet was revised to show the position every eight hours of the recorder switches. The heat tracing log sheets were revised to include instructions to write a PWO for abnormal heat tracing circuits and the operators were instructed to note on the log sheets the reason or PWO number for any abnormal circuits.
5. Full compliance was achieved on June 2, 1982.

FINDING C:

Technical Specification 6.8.1 requires that procedures be maintained.

Contrary to the above, OP 9600.1 was not maintained in that it has not been updated to reflect the discontinued "spare" designation of breakers 3A-9, 3A-19, 3A-22, 3A-31, 3A-32, 3A-39, 4B-24, 4B-31, 4B-32, 4B-35 and 3B-15 on the DC distribution panels.

RESPONSE:

1. FPL concurs with the Finding.
2. The breakers erroneously shown as spares had been connected and put into service in accordance with various design changes which had not yet been reported as complete.
3. As corrective action, on May 6, 1982, a proposed change to Operating Procedure 9600.1 was reviewed and approved by the Plant Nuclear Safety Committee. The change covered all the breakers listed in the finding except breaker 3A-9. The letter was put into use in accordance with PC/M 78-81B which is only partially completed. The procedure should be issued by June 20, 1982. A change to the procedure to incorporate the changes installed by PC/M 78-81B is not necessary at this time because the PC/M is not finished yet.
4. The response to this item will be provided in our response to IE Inspection Report 82-20 which is due June 25, 1982.
5. Full compliance will be achieved on June 25, 1982.