



FLORIDA POWER & LIGHT COMPANY

August 25, 1982

L-82-374

2082 48:37

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 & 4
Docket Nos. 50-250 and 50-251
IE Inspection Report 82-24

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,

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

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/mbd

Attachment

cc: Harold F. Reis, Esquire

8210010321 820913
PDR ADOCK 05000250
G PDR

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250, 50-251
IE INSPECTION REPORT 82-24

FINDING:

- A. 10 CFR 50, Appendix B, Criterion XVI as implemented by Quality Procedure 16.1, "Corrective Action," of the Florida Power and Light Company Quality Assurance Topical Report, FPL TQAR 1-76A requires, in paragraph 5.3.1.d the following: "For significant conditions adverse to quality which are reportable, the cause of the condition shall be determined and documented and corrective action shall be taken to prevent recurrence."

Contrary to the above, corrective action that would prevent recurrence of the condition described in licensee event report (LER) 50-250/81-11, "Fire Stop Inoperable", was not taken as evidence by the subsequent development of similar conditions relating to inoperable fire stops as described in LER 50-250/81-14 and 50-250/82-01.

RESPONSE:

1. FPL concurs with the finding.
2. The reason for the finding was inadequate understanding by the Construction Department on-site of the importance of strict compliance with the requirements regarding penetrations to fire barriers.
3. As corrective action the following steps were taken:
 - A. The Plant Manager discussed with appropriate plant construction personnel the need for increased control of activities which affect the operability of fire barrier penetrations.
 - B. A letter was issued to plant department heads and construction management explaining the requirements regarding fire barrier penetrations and emphasizing the need for increased attention to compliance with these requirements.
4. In order to prevent recurrence:
 - A. Responsibility for this area has been assigned to the Fire Protection Supervisor.
 - B. The Fire Protection Supervisor has been asked to perform a study of the controls on fire barriers and to recommend any changes needed.
5. Full compliance was achieved on August 3, 1982.

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FINDING:

- B. Technical Specification 6.8.1 requires that procedures be implemented. Step 4.4 of Operating Procedure 11550.1, "Radiation Work Permit" requires: "All protective clothing and contamination control requirements shall be met prior to beginning work under an RWP."

Step 8.3.1 of Operating Procedure 11550.2, "Radiation Rules of Practices" requires: "All persons working with radioactive material where contamination of the person is possible shall wear protection clothing appropriate to the work involved, as stated in the Radiation Work Permit. The color of this clothing is normally yellow."

Contrary to the above, on June 24, 1982, certain licensee personnel entered the 4B High Head Safety Injection pump maintenance area without the necessary protective clothing required by radiation work permit RWP-197.

RESPONSE:

1. FPL concurs with the finding.
2. This incident occurred because the personnel involved failed to comply with the standard work practices of checking the requirements of the posted RWP.
3. The involved personnel were removed from the area and were dressed out in accordance with requirements of the posted RWP for the area.
4. The members of the crew were informed of their responsibility to comply with procedures before beginning maintenance activities in the RCA. They were also informed of future consequences on this type of violation.
5. Full compliance was achieved August 17, 1982.