

UNITED STATĘS NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA STREET, N.W. ATLANTA, GEORGIA 30303

Report Nos. 50-250/82-29 and 50-251/82-29	
Licensee: Florida Power & Light Company 9250 West Flagler Street Miami, FL 33101	
Facility Name: Turkey Point 3 and 4	
Docket Nos. 50-250 and 50-251	
License Nos. DPR-31 and DPR-41	
Inspection at Turkey Point site near Homestead, Florida Inspector: Kerry Landis for R. J. Vogt-Lowell	9/2 Date
Accompanying Personnel: J. A. Agles Approved by: C. Julian, Section Chief, Division of Project and Resident Programs	9/2 Date

SUMMARY

Inspection on July 26, 1982 - August 26, 1982

Areas Inspected

This routine announced inspection involved 292 resident inspector-hours on site in the areas of licensee actions on previous inspection findings; licensee event report followup; plant operations; surveillance test observation; and plant tours.

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Signed

Results

Of the five areas inspected, no violations or deviations were identified in four areas; one violation was found in one area (Violation - Failure to follow equipment clearance procedure - paragraph 8).

DETAILS

1. Persons Contacted

Licensee Employees

- *D. W. Haase, Plant Manager Nuclear (Acting)
- *H. N. Paduano, Manager Nuclear Energy Services
- J. P. Mendieta, Maintenance Superintendent Nuclear
- *V. A. Kaminskas, Operations Superintendent Nuclear (Acting)
- J. P. Lowman, Assistant Superintindent Mechanical Maintenance Nuclear
- L. L. Thomas, Assistant Superintendent Mechanical Maintenance
- W. R. Williams, Assistant Superintendent Electrical Maintenance Nuclear
- *J. W. Kappes, Instrumentation and Control Supervisor
- *V. B. Wager, Operations Supervisor
- J. S. Wade, Chemistry Supervisor
- *P. W. Hughes, Health Physics Supervisor
- *D. W. Jones, Quality Control Supervisor
- K. N. York, Document Control Supervisor
- J. A. Labarraque, Technical Department Supervisor
- J. C. Balaguero, Licensing Engineer
- *S. Feith, Operations QA Supervisor
- H. Hendricks, Coordinator of Power Plant Stores
- L. Cash, Stores Turkey Point
- M. Fowler, Stores Turkey Point
- *S. Verduci, FP&L Licensing

Other licensee employees contacted included construction craftsmen, technicians, operators, mechanics, security force members.

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on August 31, 1982, with those persons indicated in paragraph 1 above. The inspector maintained frequent unprogrammed discussions and communications with the Plant Manager during the inspection report period. The licensee did not take exception to the findings discussed in this report.

- 3. Licensee Action on Previous Inspection Findings
 - a. (Closed) 250/82-22-01 Failure to respond to RWST low level alarm: The inspector reviewed the licensee's corrective action and had no further questions.
 - b. (Closed) 250, 251/82-21-02: Written Instructions for Dispositioning of Plant Work Order (PWO) - The licensee issued procedure A.P. 103.14, "PWO's - Equipment Identification & Status" following its approval by

the Plant Nuclear Safety Committee on August 5, 1982. The inspector had no further questions.

- c. (Closed) 251/82-20-01: Failure to Implement and Maintain Procedures -The inspector reviewed the licensee's corrective action and had no further questions.
- 4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Licensee Event Report (LER) Followup

The following LER's were reviewed and closed. The inspector verified that reporting requirements had been met, causes had been identified, corrective actions appeared appropriate, generic applicablility had been considered, and the LER forms were complete. Additionally, for those reports identified by asterisk, a more detailed review was performed to verify that the licensee had reviewed the event, corrective action had been taken, no unreviewed safety questions were involved, and violations of regulations or technical specification conditions had been identified.

250-82-11, Missed Seismograph Surveillance Testing *251-82-06, Boron Injection Tank Concentration *251-82-07, Boron Injection Tank Concentration

6. Plant Operations

The inspector kept informed on a daily basis of the overall plant status and any significant safety matters related to plant operations. Discussions were held with plant management and various members of the operations staff on a regular basis. Selected portions of daily operating logs and operating data sheets were reviewed during the report period. The inspector conducted various plant tours and made frequent visits to the control room. Observations included witnessing work activities in progress, status of operating and standby safety systems, confirming valve positions, instrument readings and recordings, annunciator alarms, housekeeping, radiation area controls, and vital area controls. Informal discussions were held with operators and other personnel on work activities in progress and the status of safetyrelated equipment or systems.

The inspector attended Plant Nuclear Safety Committee (PNSC) meetings 82-74 and 82-77 held on August 12 and 26, 1982, respectively. The inspector confirmed adherence to the technical specifications requirements related to PNSC meetings.

On August 12, 1982, the inspector conducted an inspection of the licensee's storage areas. The inspector verified that material and spare parts are being received, inspected and stored in accordance with licensee procedure

A.P. 190.72, "Receipt Inspection, Identification and Control of Nuclear Safety Related and Fire Protection Parts, Materials and Components."

On August 20, 1982, the inspector observed performance of portions of O.P. 5163.2, "Waste Disposal System - Controlled Liquid Release to the Circulating Water" in connection with Radioactive Liquid Release Permit (LRP) number 82-650.

The inspector reviewed the log for boric acid storage tank (BAST) boron concentration, noting the following recent values:

Date	Tank A (ppm)	Tank B (ppm)	Tank C (ppm)
8/11/82	20,100	21400	21200
8/13/82	21,100	21400	21500
8/16/82	21,100	21700	22000
8/18/82	21,100	21400	21100

On July 26, 1982 the inspector witnessed the startup of Unit 4 in accordance with OP 202.1 "Reactor Startup, Cold Conditions to Hot Shutdown Conditions" and OP 202.2 "Unit Startup, Hot Shutdown to Power Operation" Two trips were observed during the startup. One was due to a spurious turbine overspeed trip signal and the second was due to a spike on source range instrument N32. Proper permission was obtained prior to continuing the startup following both trips. Both trips occurred with shutdown rods fully withdrawn and all control rods fully inserted. Following the spike on source range instrument N32 the channel was placed in the "blocked" condition, and the startup continued on a single source range instrument as permitted by technical specifications. During the performance of step 8.31.2 of OP 0202.1 the "C" Auxiliary Feedwater Pump was found to be inoperative because of repeated lifting of its associated relief valve. The startup was completed with the remaining two AFW pumps as permitted by Technical Specification 3.8.4.a (Unit 3 was shutdown). The inspector followed up on the resolution of the "C" AFW pump which on July 27, 1982 was found to have the relief valve lifting prematurely at 325 psig vice 400 psig. The relief valve was removed and reset. On July 30, 1982 the inspector witnessed the performance of OP 7304.1 "Auxiliary Feedwater System - Periodic Test" for the "C" AFW pump. The pump was observed to meet the proper head and flow characteristics in the required time for two consecutive tests. No violations or deviations were identified within the areas inspected.

7. Surveillance Test Observation

On August 18, 1982 the inspector witnessed Instrumentation and Control technicians performing OP 14004.4, Pressurizer Pressure and Water Level Protection Channels - Periodic Test, for Unit 3. The test was completed satisfactorily. One adjustment was required to bring the high pressure reactor trip setpoint on Channel II within specification. No violations or deviations were identified within the areas inspected.

On August 18, 1982 the inspector accompanied instrumentation and control personnel on a Unit 4 containment entry at power. During the entry the inspector witnessed the proper operation of the personnel access hatch in accordance with OP 13513 "Personnel Access Hatch - Operating Instructions." While inside the containment the inspector witnessed the calibration of the Channel III pressurizer level detector per applicable portions of OP 14007.13 "Pressurizer Water Level Instrumentation Calibration." Prior to the containment entry the inspector attended personnel briefings on the work to be performed such that radiation exposure would be minimized. The inspector noted no violations or deviations in the performance of the described work. The inspector concluded the radiation exposure ALARA concept had been properly observed for this work.

On August 23, 1982 the inspector observed the control room shift turnover of Units 3 and 4 in accordance with Administrative Procedure 0103.2 "Duties and Responsibilities of Operators on Shift and Maintenance of Operating Logs and Records." No violations or deviations were noted within the areas inspected.

8. Plant Tours

Various plant tours were conducted by the inspectors. Attention was focused on the operability of safety-related equipment in the following areas: cable spreading room; inverter and battery room; motor generator set and battery rooms; Rod Control Equipment Rooms; switchgear rooms; Diesel Generator and Day Tank rooms; Auxiliary Building.

On August 5th during a routine tour of the safety injection pump room the inspector noted a danger tag hanging on the manual operator of unit 4 valve MOV-878B. The tag required the valve to be shut when in fact it was open. A check of the associated equipment clearance order (ECO) disclosed the following:

- The tag (tag #1 of ECO 7-155) should have been place on MOV-878B control switch on vertical panel B in the control room instead of the manual operator.
- ECO 7-155 was released 13 days prior to the inspector noting the tag. The operator closing the tag looked on the control switch, and annotated the tag as "missing" on the ECO.
- 3. Personnel positioning and tagging MOV-878B failed to initial and time this action in the space provided on the ECO. This is contrary to step 8.5.2 of administrative Procedure 0103.4 (In Plant Equipment Clearance Orders).
- 4. Associated MOV 878B electrical breaker was never tagged. This is contrary to step 4.5 of AP 0103.4 which states for a clearance on a motor operated valve, the valve shall be positioned as required by the clearance, its breaker opened and tagged, and its control switch tagged.

5. The tag in question was related to a two part maintenance item covered by two separate plant work orders (PWO's). The first PWO (2026) was for replacement of valve 895 U on the Unit 4 (shutdown) safety injection system. The second PWO (2028) permitted installation of a blank flange in-line between the Unit 4 boron injection tank and the four safety injection pumps. This blank flange served as the ultimate isolation for the first PWO on 895U. Installation of the blank flange required shutting of MOV-878B isolating the 4A and 4B safety injection pumps from Unit 3 (operating at power). Therefore installation of the blank flange and reopening of MOV - 878 B was required by Technical Specification 3.4.1.b.2 to be completed within 24 hours . The PWO for installation of the blank clearly required the ECO to be released after the blank was installed. Instead of releasing the clearance however, a temporary lift of the tag on MOV-4-878B was performed. This "temporary lift" resulted in no verifiable record being maintained to indicate that MOV-878B had been reopened and independently verified as such while valve 895 U was worked for the next 21 days. The temporary lift in this instance was not in accordance with AP 0103.4 step 8.6, since the intent was to return the system to service for Unit 3, and not test it prior to release. Step 8.6 states that operations personnel shall perform the necessary testing prior to releasing clearances to insure that the equipment is operable.

The failure to follow all the requirements of AP 0103.4, "In Plant Equipment Clearance Orders" Constitutes a violation (50-250, 251/82-29-01).