

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

Report Nos. 50-250/82-34 and 50-251/82-34

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 Ncs. DPR-31 and DPR-41

Inspection at Turkey Point site mear Homestead, Florida

Inspector:

Accompanying Personnel: J. A. Agles Approved by: C. Julian, Section Chief, Division of Project and Resident Programs

Signed

SUMMARY

Inspection on September 26 - October 25, 1982

Areas Inspected

This routine announced inspection involved 244 resident inspector-hours on site in the areas of licensee actions on previous inspection findings; licensee event report follow-up; plant operations; surveillance test program; and plant tours.

### 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 procedures - paragraph 5)

# DETAILS

### 1. Persons Contacted

#### Licensee Employees

- H. E. Yeager, Site Manager
- \*J. K. Hays, Plant Manager Nuclear
- \*J. P. Mendieta, Maintenance Superintendent Nuclear
- \*D. W. Haase, Operations Superintendent Nuclear
- J. P. Lowman, Assistant Superintendent Mechanical Maintenance Nuclear
- L. L. Thomas, Assistant Superintendent Mechanical Maintenance
- J. Kenney, Primary Maintenance Supervisor
- W. R. Williams, Assistant Superintendent Electrical Maintenance Nuclear
- J. W. Kappes, Instrumentation and Control Supervisor
- \*V. B. Wager, Operations Supervisor
- \*V. A. Kaminskas, Operations Superintendent Nuclear (Acting)
- P. W. Hughes, Health Physics Supervisor
- J. H. Hopkins, Rad Waste Supervisor
- \*D. W. Jones, Quality Control Supervisor
- K. N. York, Document Control Supervisor
- \*J. A Labarraque, Technical Department Supervisor
- J. C. Balaguero, Licensing Engineer
- R. Tucker, Operations QA Supervisor Acting
- \*K. Paduano, Manager, Nuclear Energy Services
- \*J. Ferrare, Manager Nuclear Engergy Services

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

\*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on November 3, 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 inspection report.

3. Licensee Action on Previous Inspection Findings

(Closed) Unresolved 250/82-24-03: West Fire Pump operability testing. The inspector reviewed the licensee's documentation 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 applicability 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.

250-82-03, Cracked Well 251-81-10, Foreign Objects in Steam Generators

\*251-82-14, BIT Temperature Below Technical Specification Limit.

The inspector investigated the circumstances surrounding the low readings on the BIT (Boron Injection Tank) outlet piping heat tracing. The B train of circuit 54 was not functioning and the A train circuit had been unable to maintain temperature because the piping was not lagged as required. A review of the available documentation suggests that the missing insulation had been removed during September 1982 maintenance activities on circuit 54 and not reinstalled at the conclusion of the maintenance on September 20, 1982. The inspector reviewed PWO-4426 (Plant Work Order) which was originated for this maintenance and noted that no provisions for replacement of thermal insulation removed or damaged during the maintenance on the heat traced line was included on the PWO. Absence of these provisions was not identified by the Quality Control Department's pre-job review, as required by paragraph 8.1.5 of Administrative Procedure A.P. 190.19, "Control of Maintenance on Nuclear Safety Related and Fire Protection Systems." Furthermore, paragraph 8.2 of A.P. 103.11 "Housekeeping" was not followed in that all thermal insulation was not restored to its original condition immediately after the job. as required.

It should be noted that these two deviations from procedures are deviations from administrative controls which were instituted as corrective actions to a similar violation reported in IE Inspection Report 81-33. These corrective actions are documented in the licensee's March 1, 1982 correspondence to the NRC.

The failure to fully follow procedures A. P. 190.19 and A. P. 103.11 is a violation (50-251/82-34-01)

## 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 alarns, 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 safety-related equipment or systems.

On October 6, 1982 the inspector witnessed performance of periodic testing on the "C" Auxiliary feedwater pump in accordance with OP 7304.1. This pump has previously required extensive maintenance as a result of failure to perform satisfactorily during the last periodic test on September 17, 1982 (LER 250-82-13). Testing on October õ was observed to be properly conducted and the "C" Auxiliary feedwater pump met the test criteria. No discrepancies were noted.

On October 18, 1982 the inspector witnessed performance of periodic testing on the Unit 4 RHR pumps in accordance with OP 3204.1 Residual Heat Removal System - Periodic Test. The plant was being maintained in cold shutdown with the RHR system in service for decay heat removal. Test results and performance of testing were satisfactory. No discrepancies were noted.

On October 25, 1982 the inspector performed an audit of Equipment Clearance Order 10-076, 10-080 and 10-083. These clearances were performed to provide proper isolation for the replacement of the "C" auxiliary feedwater pump steam turbine with a new high pressure unit (./C/M 80-105). The equipment clearances were primarily audited to ensure that the isolation would not impair the operability of auxiliary feedwater pumps A and B which were required to remain operational by Technical Specification section 3.8.4.a. No discrepancies were noted.

During the September 26 to October 25, 1982 inspection period, a systematic review was conducted of the surveillance test program to ensure that all Technical Specification surveillance requirements are being observed. The specific inspection objectives and associated findings were as follows:

 Verify that administrative controls have been established which provide positive assurance that Technical Specification Changes (Amendments) will be incorporated into plant procedures, instructions, or drawings, as appropriate.

The inspector observed that administrative control have been provided by Administrative Procedure 0190.25 (July 16, 1976) - Compliance Review Program. When properly performed this procedure ensures that plant procedures affected by Technical Specification Amendments are identified and the probable changes described. The inspector noted however, that the procedure does not provide a formalized (specified in writing) method of tracking the required procedure and program changes to completion. This procedural weakness was concurrently noted by plant management, and a commitment of January 30, 1983 was made to change AP 190.25 in an appropriate manner. (This will be tracked by the inspector as item 250/82-34-01).

b. Verify that Technical Specification amendments have resulted in acceptable revisions to appropriate documents and that these measures have been implemented in a manner that meets the new requirements.

The inspector has noted that Administrative Procedure 190.25 -Compliance Review Program, will eventually result in acceptable revisions and technically adequate implementation of Technical Specification Amendments. However, it is noted that this process may sometimes take longer than desirable. In general, a perio of 30 days from receipt is considered a reasonable period to allow implementation of Technical Specification amendments. Licensee representatives committed to address this concern in their procedures revision.

c. Verify that the licensee has a systematic method for assuring that all Technical Specification requirements are implemented by a document or instruction.

The inspector verified that Administrative Procedure 0190.16 -Scheduling and Surveillance of Periodic Tests and Checks Required by Technical Specifications is adequate to perform this function.

d. Verify that the licensee has an effective program for assuring shift, daily, weekly, monthly, etc., tests are scheduled and completed on a timely basis.

The inspector has verified that Administrative Procedure 0190.16 -Scheduling and Surveillance of Periodic Tests and Checks required by Technical Specifications, insures that all tests other than those performed each shift and daily will be properly completed in the allotted time. Operating procedure 0204.2 - Schedule of Periodic Tests, Checks, Calibrations and Operating Evaluations, ensures that shift and daily checks get performed as required. The inspector identified one check (monthly calibration of the RCS subcooled monitor) that was being properly performed, but the results of which were not being transmitted to the QC Surveillance Technician, as specified by AP 190.16. This condition was corrected.

Randomly select surveillance requirements and verify for each selected surveillance that:

- 1. The surveillance is correctly included on the facility schedule.
- A technically adequate procedure exists for performing the surveillance and that the proper equipment is identified to be surveilled.

 Verify from the procedures that the surveillance has been performed at the frequency specified in the Technical Specifications and that status is correctly reflected on the surveillance scheduling records.

The inspector looked at approximately 15 Technical Specification surveillance requirements and verified (1), (2) and (3) above. No discrepancies were noted.

- e. Verify that the licensee's Quality Assurance program includes audits of surveillance activities. Verify the adequacy of QA audits by:
  - Review of the audit schedule to assure that all (100%) surveillance requirements are included over a reasonable length of time.

The inspector verified that a 100% audit of all Technical Specification surveillance requirements is performed on an annual basis.

(2) Review of the methodology of audits to assure that the technical adequacy of surveillance procedures is included.

The inspector has verified that QA's audit of surveillance procedures includes the verification that the procedure has been through the proper in-plant review cycle including the PNSC (Plant Nuclear Safety Committee) when required. This assures technical adequacy.

(3) Assurance that QA verifies that all license amendments involving surveillance requirements are included in the licensee's program.

The inspector has verified that this objective will be met as a consequence of the 100% annual audit discussed in (1) above.

# 8. Plant Tour

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 generators rooms and day tank rooms; and auxiliary building.

No violations were identified within the areas inspected.