

Original File Copy

JUL 05 1984

Florida Power and Light Company
ATTN: Mr. J. W. Williams, Jr.
Group Vice President
Nuclear Energy Department
P. O. Box 14000
Juno Beach, FL 33408

Gentlemen:

SUBJECT: REPORT NOS. 50-250/83-24 AND 50-251/83-24

Thank you for your response of August 29, 1983, to our Notice of Violation issued on June 25, 1983, concerning activities conducted under NRC Operating License Nos. DPR-31 and DPR-41.

We have reviewed your response to Violation A and have concluded, for the reasons presented in the enclosure to this letter, that the violation occurred as stated in the Notice of Violation. Furthermore, we noted that your Topical Quality Assurance Program Sections 14 and 17 and the requirements of ANSI N45.2-1971 are not properly implemented in your Quality Procedures which address Quality Assurance Records. Therefore, in accordance with 10 CFR 2.201 and within 30 days of the date of this letter, please resubmit your response to the Notice and describe your actions to implement these requirements and your Topical Quality Assurance Program.

With respect to your statement that individual blank lines in the front of the steps in system alignment procedures are there as an aid to the operator and not as a space for documentation, you are reminded that most system alignments require independent verification of individual valve or switch positions. It is recognized that other means of data collection, such as data sheets, may be used but you should, in each procedure, make it clear what the blanks are for and how the initial alignment examination and independent alignment verification of each valve or switch is to be documented.

It has come to our attention recently that, at the plant level, steps are being taken to include spaces for initials in plant procedures that are being revised and to retain system alignment procedures until next time the procedure is performed. These are considered to be positive actions and will be reviewed during future inspections.

Should you have any questions concerning this letter, we would be happy to meet with you and discuss the matter further.

Sincerely,

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PDR ADOCK 05000250
Q PDR

Richard C. Lewis, Director
Division of Reactor Projects

Enclosure: (See page 2)

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Enclosure:
Staff Evaluation of Licensee Response

cc w/encl:
K. N. Harris, Vice President
Turkey Point Nuclear Plant
C. J. Baker, Nuclear Plant Manager
Turkey Point Nuclear Plant

bcc w/encl:
Document Control Desk
State of Florida
NRC Resident Inspector

RII
SAG
JKenison:dr
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ENCLOSURE

STAFF EVALUATION OF LICENSEE RESPONSE

DATED AUGUST 29, 1983

The licensee made the following statement in the denial:

"The procedures listed (with the exception of the data sheets of OP 1004.5) indicate that they were not intended to be QA records. The determination to write the procedures that way was made by plant management and reviewed by the Plant Nuclear Safety Committee. During the procedure review process for new and revised procedures the question of whether or not the procedure generates any QA records is asked and if so the procedure states that those records are QA records. In answering that question, related requirements are reviewed. Recently, the applicable requirements, such as Topical Quality Requirement 17.0, Quality Procedure 17.1, Administrative Procedure 0190.14, Technical Specification 6.10 and ANSI N45.2.9-1979, have been reviewed and we have reaffirmed that we can find no requirement to have these procedures signed off when they are completed and then retained as QA records. The blank lines in front of the steps in the procedures are there as an aid to the operators and not as a space for documentation".

The staff acknowledges that the reason completed procedures are not being treated as QA records is because FPL management decided not to; however, the quality assurance program (FPL-NQA-100A) commits to the following standards with certain exceptions:

ANSI N45.2 - 1971
ANSI N45.2.9 - 1974
ANSI N45.2.10 - 1973

Quality Assurance program Appendix C under the exceptions to ANSI N45.2.10-1973 defines inspection as examination, observation, or measurement to determine conformance of materials, supplies, components, parts, appurtenances, systems, processes or structures to predetermined requirements. ANSI N45.2.10-1973 further states that examination includes simple physical manipulation, gaging, and measurements. Consequently, when your operator performs valve (or switch) lineups to verify predetermined position requirements, that person is performing an examination of each valve or switch. This is a type of inspection. For the purposes of this letter, it is assumed that the normal operator training program qualifies the operators to make these position inspections.

The licensee's QA program Appendix C does not take exception to ANSI N45.2-1971 as endorsed by Regulatory Guide 1.28 (6/6/72). Section 18 of this ANSI standard requires that records shall include, among many other things, inspections and further specifies certain attributes of inspection records such as identifying the date of inspection, the inspector or data recorder, type of observation, results, acceptability, etc. It is noted by the staff that the examination of

each valve or switch position is an individual examination and requires individual, i.e., line-item data such as initials, position, etc.

The licensees Quality Assurance Program takes certain exceptions to ANSI N45.2.9-1974 Section 2.2 concerning the definition of lifetime and nonpermanent records. Without this exception, the valve line-up records would clearly be lifetime records under ANSI N45.2.9-1974 definition 2.2.1.1 - "Records of significant value in demonstrating capability for safe operation" and definition 2.2.1.3 - "Records that would be of significant value in determining the cause of an accident or malfunction of an item". With the exceptions, the records are at least nonpermanent records required by the licensee's commitment to ANSI N45.2 Section 18. Additionally, ANSI N45.2.9-1974 subparagraph 3.2.7 states that record retention times are listed in ANSI N45.2.9 Appendix A. This subparagraph further states that when a record is generated as a result of an operational phase activity, the classification of these records will be the same as those types of records generated during the initial construction period. Appendix A, Section A.4, states that data sheets or logs on equipment installation, inspection, and alignment are classified as nonpermanent records with a two-year retention time. Since the records are intended to furnish documentary evidence that "activities affecting quality" were performed in accordance with applicable requirements, they obviously should be maintained at least until the next time that activity, i.e., valve line up or check, is completed regardless of the time period.