



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

Report Nos.: 50-250/84-12 and 50-251/84-12

Licensee: Florida Power and Light Company  
9250 West Flagler Street  
Miami, FL 33101

Docket Nos.: 50-250 and 50-251

License Nos.: DPR-31 and DPR-41

Facility Name: Turkey Point 3 and 4

Inspection at Turkey Point site near Homestead, Florida

Inspector:	<u><i>J. Blake</i></u>	<u>4/20/84</u>
	W. P. Kleinsorge	Date Signed
Approved by:	<u><i>J. Blake</i></u>	<u>4/20/84</u>
	Jerome J. Blake, Section Chief	Date Signed
	Division of Reactor Safety	

SUMMARY

Inspection on April 9-12, 1984

Areas Inspected

This routine, unannounced inspection involved thirty-four inspector-hours on site in the areas of general inspections, inservice inspection (ISI), licensing action, IE Bulletin (IEB) and inspector followup items.

Results

Of the four areas inspected, no violations or deviations were identified in three areas; one apparent violation was found in one area (Violation - "Failure to follow Maintenance Procedure" - paragraph 8c).

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## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

- \*C. Baker, Plant Manager - Nuclear
- \*D. W. Haase, Operations Superintendent Nuclear
- \*J. A. Labarraque, Technical Department Supervisor
- \*J. Arias, Lead Licensing Engineer
- \*H. E. Hartman, Inservice Inspection
- F. T. Carr, NDE Engineer (ISI)

Other licensee employees contacted included technicians, mechanics, and office personnel.

#### NRC Resident Inspectors

- \*T. A. Peebles
- \*D. R. Brewer

\*Attended exit interview

### 2. Exit Interview

The inspection scope and findings were summarized on April 12, 1984, with those persons identified in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings listed below. No dissenting comments were received from the licensee.

(Open) Violation 250/84-12-01: "Failure to follow Maintenance Procedure" - Paragraph 8c.

### 3. Licensee Action on Previous Enforcement Matters

Not inspected.

### 4. Unresolved Items

Unresolved items were not identified during this inspection.

### 5. Independent Inspection Efforts

#### General Inspection (Units 3 and 4)

The inspector conducted a general inspection of the Unit 4, containment and the Units 3 and 4, turbine and auxiliary buildings to observe outage progress and activities such as material handling and control, housekeeping, and storage.

Within the areas examined, no violations or deviations were noted.

## 6. Inservice Inspection (ISI)

The inspector reviewed the ISI procedures and observed work activities indicated in the following paragraphs to determine whether the procedures and activities were consistent with regulatory requirements and licensee commitments. The applicable code for ISI is ASME B & PV Code, Section XI, 1974 edition with addenda through Summer 1975.

### a. Review of Procedures (73052B) (Units 3 and 4)

#### (1). Approval

The inspector reviewed the below listed procedures to ascertain whether they had been approved by authorized licensee personnel and Level III examiners.

<u>Numbers</u>	<u>Title</u>
SwRI-200-1, Rev. 56	"Liquid Penetrant Examination Color Contrast Method"
SwRI-IX-FE-103-2, Rev. 2	"Weld Joint Identification Marking on Nuclear Power Plant Piping"
SwRI-800-86, Rev. 0	"Manual Ultrasonic Examination of Pressure Piping Welds for FPL Co."

#### (2) Procedure Review

##### (a) Liquid Penetrant

The inspector reviewed SwRI Procedure NDE-200-1 to ascertain whether it had been reviewed and approved in accordance with the licensee's established QA procedures. The above procedure was reviewed for technical adequacy and conformance with ASME, Section V, Article 6, and other licensee commitments/requirements in the following areas: specific method; penetrant materials identified; penetrant materials analyzed for sulfur; penetrant materials analyzed for total halogens; acceptable pre-examination surface; drying time; method of penetrant application; surface temperature; solvent removal; dry surface prior to developing; type of developing; examination technique; and evaluation technique.

## (b) Ultrasonic

The inspector reviewed SwRI Procedure NDE-800-86 to ascertain whether it had been reviewed and approved in accordance with the licensee's established QA procedures. The above procedure was reviewed for technical adequacy and conformance with ASME, Section V, Article 5, and other licensee commitments/requirements in the following areas: type of apparatus used; extent of coverage of weldment; calibration requirements; search units; beam angles; DAC curves; reference level for monitoring discontinuities; method of demonstration of penetration; limits for evaluating and recording indications; recording significant indications; and acceptance limits.

## (c) Records

The inspector reviewed SwRI Procedure Nos. NDT 800-86 and NDT-200-1 to ascertain whether they specify completion of required records.

## b. Observation of Work and Work Activities (Unit 4) (73753B)

The inspector observed the ISI activities described below to determine whether these activities had been performed in accordance with regulatory requirements and licensee procedures.

## (1) Examiner Qualification

The inspector reviewed the qualification record for the below listed examiner to determine whether his qualification was consistent with the licensee's procedures and regulatory requirements.

<u>Examiner</u>	<u>Level &amp; Method</u>
EHE	II-PT

## (2) Liquid Penetrant Examination

The inspector observed the solvent removable liquid penetrant examination of below listed weld joint. The above observation was compared with the applicable procedure in the following areas: specific method; penetrant material; pre-examination surface; drying time; surface temperature; removal method; pre-developing surface; examination technique; examination conditions; evaluation techniques; and reporting results.

<u>Line No.</u>	<u>Weld No.</u>	<u>Unit</u>
2-RC-102	29	4

## (3) Ultrasonic Examination

In progress ultrasonic (UT) inspection work activity was observed and compared with the requirements of the applicable procedure and code in the following areas: availability of and compliance with approved NDE procedures; use of knowledgeable NDE personnel; use of NDE personnel qualified in the proper level; recording of inspection results; type of apparatus used; extent of coverage of weldment; calibration requirements; search units; beam angles; DAC curves; reference level for monitoring discontinuities; method of demonstration of penetration; limits for evaluating and recording indications; recording significant indications; and acceptance limits.

Inspection

The inspector observed calibration activities reported on sheet Nos. 190202 and 190203.

## c. Data Review and Evaluation (Units 3 and 4)(73755B)

The inspector reviewed the NDE records for the most recent ISI inspection of the below listed components to determine whether the selected records contained or referenced by the following documents: examination results and data sheets; examination equipment data; calibration data sheets; examination evaluation data; records on extent of examination; records on deviation from program and procedures including justification for deviation (if applicable); records on disposition of findings; re-examination data after repair work (if applicable); and identification of NDE material such as penetrant, penetrant cleaner, couplant, films, tapes, etc.

Components

Regenerative Heat Exchangers I, II, and III for Unit 3 and 4.

Within the areas examined, no violations or deviations were identified.

## 7. Licensing Action (Units 3 and 4)

FP&L in Letter L-83-501 of December 16, 1983, requested relief from technical specification inservice inspection requirements identified as Relief Request No. 9. The inspector reviewed Relief Request No. 9 and compared the same with the Technical Specification, the applicable revisions and addenda of Section XI of the ASME B and PV Code, inservice inspection records, and radiological survey data.

With regard to the above inspection the inspector noted the following:

(a) Paragraph B.5.6 states:

"Code Item No. 3.2, The primary nozzels are cast with the head. No inspections are planned."

This is not the case: the nozzels are welded in as shown in Attachments 1 and 2. These welds: RGX ( )-9 ----RGX( )-12 are included in the inspection plan and the inspections through the second inspection period have been completed as stated in paragraph D1.

- (b) Paragraph D.1 indicates that attachments 3 and 4 are applicable to both units, in fact Attachments 3 and 4 contain actual data for Unit 3 only. The inspector determined that the radiation levels for Unit 4 on March 9, 1984, were of the same level of magnitude as reported in Attachments 3 and 4 for Unit 3.
- (c) Attachment 3 indicated that all but two readings were contacted readings when in fact there were seven readings that were made at 18-inches and not on contact. Therefore, Attachment 3 indicates a less severe radiological condition than actually existed.

8. IE Bulletin (IEB) (92703B)

a. (Closed) IEB 79-13: "Cracking in Feedwater System Piping"

The licensee completed the inspections required by the Bulletin for both Units 3 and 4 in 1979 and 1980. The feedwater reducers in both units were found to be cracked and replaced in 1980. The licensee's response to the Bulletin is documented in: LER 251/80-008; LER 250/80-019; FP&L letter L-79-195 dated July 17, 1979; and FP&L letter L-79-199 dated July 23, 1979. RII inspections are documented in reports 50-250/80-34, 50-250/80-20, 50-251/80-17, 50-251/80-16, 50-250/80-01, 50-251/80-01, 50-250/79-22, and 50-251/79-22. The licensee's ISI program presently requires volumetric examination of one feedwater reduce to nozzle weld each outage.

Based on review of licensee response and the RII inspections, the Bulletin is closed.

b. (Closed) IEB 80-08: "Examination of Containment Liner Penetrations"

The licensee submitted an updated response to the bulletin on September 15, 1981 (SER L-81-404) discussing the Unit 3 Penetration Inspection Results. This response states that all penetrations except one had radiographs on file. Penetration No. 32 was radiographed on July 29, 1981, and rejected for indication of the construction related weld problem.

The weld was repaired reradiographed and accepted on August 26, 1982. The inspector reviewed those radiographs. This Bulletin is considered closed.

- c. (Closed) IEB 82-02: "Degradation of Threaded Fasteners in the Reactor Coolant Pressure Boundary of PWR Plants"

The inspector has reviewed letters of July 15, 1983, August 12, 1983 and March 9, 1984, and determined that the requested actions of the bulletin have been acceptably addressed. The inspector held discussions with the responsible engineer, reviewed supporting documentation, and observed representative samples of work to verify that the actions identified in the letter of response have been completed.

With regard to the inspection above, the inspector determined that Fel-Pro-N-5000 Lubricant was used on No. 3A reactor coolant pump closure studs, installed on or about July 26, 1981, as reported in the licensee's August 2, 1982, letter. The above is contrary to FP&L Turkey Point Maintenance Procedure MP 1107.3, "Reactor Coolant Pump Impeller Removal and Replacement," all revisions to and including September 2, 1982, steps 9.10 and 9.93 which require Fel-Pro-C5A Lubricant be used to lubricate reactor coolant studs prior to installation. MP 1107.3 started July 24, 1981, and completed February 28, 1982, for the No. 3A Reactor Coolant Pump had steps 9.10 and 9.93 initialed indicating that Fel-Pro-C5A was used when, in fact, Fel-Pro-N-5000 was used. Therefore MP.1107.3 was not followed in the area of lubricant type.

Failure to follow procedure for activities affecting quality is in violation of 10 CFR 50, Appendix B, Criterion V. This violation will be identified as 250/84-12-01: "Failure to Follow Maintenance Procedure."

- d. (Open) IEB 83-06, "Nonconforming Materials Supplied By Tube-Line Corporation, Units 3 and 4."

The inspector has reviewed FP&L letters of December 6, 1983, and January 20, 1984, and determined that the requested actions of the bulletin have not been acceptably addressed. The inspector held discussions with the responsible engineer, reviewed supporting documentation, and observed representative samples of work to verify that the actions identified in the letter of response have been completed as known by the licensee on January 20, 1984. After the January 20, 1984, submittal, the licensee performed a programmatic vendor audit and determined that Gulf Alloy, Inc., of Houston, Texas, incorrectly reported to FP&L in an October 24, 1983, letter "... Gulf Alloy did not supply tube line material to Florida Power and Light Company projects," when, in fact, the licensee is still evaluating the situation to determine the extent of tube line material received and is the process of amending their 83-06 response. This matter remains open.

- a e. (Closed) IEB 83-07, "Apparently Fraudulent Products Sold by Ray Miller, Inc.," Units 3 and 4.

The inspector has reviewed FP&L letter of April 4, 1984, and determined that the requested action of the bulletin has been acceptably addressed. The inspector held discussions with the responsible engineer, reviewed supporting documentation, and observed representative samples of work to verify that the action identified in the letter of response has been completed.

9. Inspector Followup Item (IFI)

- a. (Closed) Item 251/83-35-01: "Unavailable Scan Sheets"

The licensee made the scan sheets available to the inspector. The inspector has no further questions and this matter is considered closed.

- b. (Closed) 250, 251/80-01-01: "Availability of ISI Programs and Data in QA Vault"

The licensee has amended their Storage Program to include the ISI program and data storage in the QA Vault. The inspector has no further questions; this matter is considered closed.