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July 5, 1984
L-84-169

Mr. James P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
Suite 2900
101 Marietta Street, NW
Atlanta, GA 30323

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Inspection Report 84-15

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, appearing to read "J. W. Williams, Jr.", is written over a faint, larger version of the same signature.

J. W. Williams, Jr.
Group Vice President
Nuclear Energy

JWW/PLP/js

Attachment

cc: J. P. O'Reilly, Region II
Harold F. Reis, Esquire
PNS-LI-84-228

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PDR ADOCK 05000251
Q PDR

ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Inspection Report 84-15

Finding

Technical Specification sections 4.14.1 and 4.14.2 require visual inspection of mechanical snubbers to insure there are no visible indications of impaired operability and that attachments to the supporting structure are secure.

Contrary to the above, the licensee failed to perform a visual inspection of the Unit 4 mechanical snubbers prior to removal of the snubbers for functional testing.

Response

1. FPL concurs with the finding.
2. The reason for the finding was the fact that the more stringent functional testing was being performed on the safety related snubbers at the same time the visual inspections were due to be performed. The functional testing was to be performed and then a complete visual inspection was scheduled on all safety related snubbers. The plant personnel involved with the snubber removal were not aware that a visual inspection was required prior to removing a snubber for functional testing. They knew only that visual inspections had to be performed prior to unit start-up.
3. To correct the deficiency and establish the next visual inspection interval, a review of inspection data from functional testing and QA inspection of installation defects was performed to identify those snubbers which would have failed an "as found" visual inspection. This data review by Site Engineering indicated that no snubbers would have failed an "as found" visual inspection on Unit 4.
4. Long term corrective action to ensure future compliance will be to add additional clarifying steps to Maintenance Procedure 0707.32, Safety Related Snubber Surveillance. These steps will specify that an "as found" visual inspection is required to be performed prior to snubber removal.
5. Full compliance will be achieved by August 31, 1984.