



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

Report Nos.: 50-250/84-15 and 50-251/84-15

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: Frank Jape 5/31/84
for J. J. Lenahan Date Signed

Approved by: Frank Jape 5/31/84
F. Jape, Section Chief Date Signed
Engineering Branch
Division of Reactor Safety

SUMMARY

Inspection on May 1-4, 1984

Areas Inspected

This routine unannounced inspection involved 28 inspector-hours on site in the areas of inspection and testing of snubbers, followup on inspector identified items, and IEB 81-01.

Results

In the three areas inspected, no violations or deviations were identified in two areas; one apparent violation was found in one area (Failure to Perform Visual Inspection of Snubbers - paragraph 6).

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REPORT DETAILS

1. Persons Contacted

J. Arias, Licensing Engineer
*C. J. Baker, Nuclear Plant Manager
*K. N. Harris, Vice-President, Turkey Point-Nuclear
J. Kenney, Maintenance Supervisor
*J. A. Labarraque, Supervisor, Technical Support
*J. M. Mowbray, Project Engineer, Backfit
*D. L. Osborn, Construction QC, Supervisor
*P. A. Roach, Licensing Engineer
B. Rotolante, Lead Mechanical - Nuclear Engineer, Technical Support

Other Organizations

J. Gnecco, Project Engineer, Teledyne
G. P. Nutwell, Project Engineer, Bechtel
L. Hinkle, Site Supervisor, Wyle Labs

*Attended exit interview.

2. Exit Interview

The inspection scope and findings were summarized on May 4, 1984 with those persons indicated in paragraph 1 above. The licensee was informed of the inspection findings noted below. The licensee acknowledged the inspection findings.

Violation 251/84-15-01, Failure to perform visual inspection of Unit 4 Snubbers.

3. Licensee Action on previous Enforcement Matters

Not inspected

4. Unresolved Items

Unresolved Items were not identified during this inspection.

5. Independent Inspection Effort

The inspector discussed the status of the IEB 79-14 program with licensee and Teledyne engineers. The inspector made a cursory review of a selected piping problem and reviewed design controls pertaining to piping and pipe support analysis. The inspector also discussed interface controls between Teledyne, Bechtel and the licensee for resolution of field problems encountered during modification of pipe supports or installation of new supports.

Within the areas inspected, no violations or deviation were identified.

6. Snubber Surveillance Program, Units 3 and 4 (module 61729)

The inspector reviewed procedures and quality records related to the snubber surveillance program and inspected selected snubbers on safety-related piping systems. Acceptance criteria examined by the inspector appear in Technical Specifications 3.13 and 4.14.

a. Review of Snubber Surveillance Procedures

The inspector examined the following procedures which control the snubber surveillance activities

- (1) Procedure number 0707.2, Mechanical Snubber Visual Inspection.
- (2) Procedure number 0707.32, Safety-Related Snubber Surveillance Program
- (3) Procedure number 0707.33, Snubber Removal and Replacement

b. Review of Results of Functional Testing of Snubbers

The inspector reviewed the results of the functional testing of the Unit 4 snubbers which were completed during the current refueling outage. The test data disclosed that 48 percent of the snubbers tested failed to meet the licensee's functional test acceptance criteria. Discussions with licensee engineers disclosed that the majority of the snubbers which were classed as failures, were those that had been installed in the containment building prior to 1977. During the examination, 17 snubbers were discovered to be unstaked. These were classed as failures without performing a functional test. Additional examination of these snubbers is planned by the licensee.

As a result of the apparent high functional test failures experienced by the Unit 4 snubbers, the licensee brought Unit 3 to cold shutdown to test and replace failed Unit 3 snubbers. To control the snubber repair program, the licensee wrote a nonconformance (NCR) on each snubber to inspect the existing installed snubber, perform a functional test on the snubber, and re-install a new snubber. The snubber replacement program was controlled by NCR numbers 118-845 through 243-845. The inspector reviewed several NCRs for which functional testing was completed. Review of the Unit 3 functional test results disclosed approximately 20 to 25% of the snubbers tested, as of the inspection date, failed to meet the licensee's functional acceptance test criteria.

The inspector noted that several of the Unit 3 and Unit 4 failures only slightly exceeded the licensee's acceptance criteria. The inspector also noted that the licensee's acceptance criteria for the drag force portion of the functional test is conservative.

The true failure rate is believed to be considerably lower than initially reported. Engineering evaluation and additional inspection is currently underway. Results will be reported by the licensee in an LER.

c. Field Inspection of Replaced Unit 3 Snubbers

The inspector examined the snubbers listed in the table below and verified that each snubber had been reinstalled in accordance with the corrective action required to disposition the NCRs. The inspector verified that the proper size snubber had been installed, correct serial numbers were recorded, cold sets were correct, alignment of both ends of the snubber were correct, pins were properly installed in the front and rear brackets, and that foundation supports were not damaged.

TABLE

<u>NCR NUMBER</u>	<u>Snubber Number</u>	<u>Hanger Number</u>
201-845	3-1077	3FWH-38C
262-845	3-1078	3FWH-38A
222-845	3-1098	H-7
224-845	3-1100	H-8
225-845	3-1101	454-17

d. Review of Results of Visual Inspection of Snubbers

The inspector examined the results of visual inspection of Unit 3 snubbers recorded on the NCRs which recorded the removal, testing and replacement of the snubber. The inspector reviewed the NCRs written to control reinstallation of the Unit 4 snubber and noted that visual inspection data were not recorded. Discussion with licensee engineers and maintenance personnel disclosed that the visual inspections had not been performed on Unit 4 snubbers as required by Technical Specification Sections 4.14.1 and 4.14.2 prior to removal of the snubbers for functional testing.

The failure to perform the visual inspection was identified to the licensee as Violation 251/84-15-01, Failure to Perform Visual Inspection of Unit 4 Snubbers.

Within the areas inspected, no deviations were identified.

7. (Closed) IE Bulletin 81-01: Surveillance of Mechanical Snubbers.

The licensee submitted its response to IEB 81-01 for Turkey Point to NRC Region II in a letter dated March 31, 1981. The licensee reported in this response that Turkey Point Units 3 and 4 did not have any INC mechanical snubbers installed on safety-related systems, and provided a schedule for inspection and manual testing of the Unit 3 and 4 PSA mechanical snubbers. The results of the inspections/testing for Unit 3 were submitted to NRC

Region II in a letter dated July 6, 1981, and for Unit 4 in a letter dated February 19, 1982.

The inspections consisted of a visual inspection of the snubber linkage assembly, and a manual stroke test to verify that snubber had freedom of movement over the range of the stroke in both compression and tension. The inspections were performed in accordance with procedure number MP 0707.2, Mechanical Snubber Inspections. The inspector reviewed procedure MP 0707.2 and examined the quality records documenting the inspection results. A total of 64 Unit 3 snubbers and 60 Unit 4 snubber were inspected and tested. The licensee identified five snubber that failed the manual stroke test. These snubbers were removed and replaced with new snubbers. The requirement to conduct routine surveillance and testing of mechanical snubber was incorporated into Technical Specification 4.14 by Amendments 96 and 90. This Bulletin is closed.

8. Previously Identified Inspector Followup Item

(Closed) IFI 250/83-21-01, Review of Licensee's Reinspection of Unit 3 Internal Containment Platform Steel. During replacement of the Unit 4 steam generators, licensee engineer discovered discrepancies in installation of bolts in connections of radial beam to containment wall brackets (beam seats) on the elevation 58 platform steel. After performance of a detailed inspection in Unit 4, the licensee inspected Unit 3 to determine if similar discrepancies existed. The Unit 3 inspection disclosed that the radial beam - bracket connections appeared to be in conformance with design requirements except for four connections. The four connections were evaluated by Bechtel and found to be acceptable. The results of the Unit 3 inspection and Bechtel's evaluation are summarized in a Bechtel letter dated April 27, 1983, Subject: Unit 3 Containment Platform at Elevation 58'-0, Beam Seat Deficiencies. However, Bechtel recommended that the licensee repair the deficient connections to restore them to their original design configuration during the next scheduled refueling outage.

Prior to making the repairs, the licensee performed a detailed reinspection of the connections during the Fall 1983 refueling outage. In addition to the four deficient connections discussed above, several other minor discrepancies (e.g., corroded bolts) were noted. These discrepancies were documented in nonconformance report (NCR) number 531-83. In order to disposition the NCR, Bechtel issued DCN number 5 to drawing number 540-C-570, sheets 1 and 2. The inspector examined the DCN and inspection report numbers C83-6121 and C83-6193 which document inspection of the work required by DCN 5. The inspector examined the beam seat connection at Azimuths 9, 31, 53, 64, 232, 276, 307, and 325, during a walkdown in the Unit 3 containment building and verified that the bolts at these locations had been replaced as required by DCN 5 to disposition the NCR. This item is closed.