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July 16, 1984  
L-84-178

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:

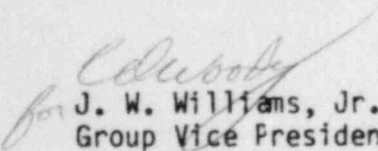
Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inspection Report 84-14

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

The NRC letter dated June 15, 1984, which forwarded the subject report, requested FPL to give particular attention to the identification and remedy of the root cause for the first finding so that its recurrence may be precluded. The attached response to the finding in question identifies the root cause and provides a description of the specific actions we are taking to prevent recurrence.

There is no proprietary information in the report.

Very truly yours,

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

JWW/PLP/js

Attachment

cc: Harold F. Reis, Esquire  
PNS-LI-84-243

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PDR ADOCK 05000250  
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## ATTACHMENT

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250, 50-251  
IE Inspection Report 84-14

### FINDING 1:

Technical Specification 6.8.1 requires that written procedures shall be implemented that meet or exceed the requirements of USNRC Regulatory Guide 1.33. The clearance tag procedure (AP 0103.4) requires that clearance tags be filled out, hung properly, and the clearance lifted before the component is manipulated.

Contrary to the above, the AP 0103.4 was not implemented on April 16, 1984, in the radioactive waste building, on April 17, during the performance of hydrostatic testing, and on April 19, during surveillance testing of the Emergency Diesel Generator, in that tags were not filled out, hung, or properly lifted.

### RESPONSE:

- 1) FPL concurs with the finding.
- 2) The reason for the finding was that the supervisors in charge of the evolutions used the clearance tags as information tags/caution tags to inform personnel that the systems were not in their normal line-ups.
- 3) As corrective action, the auxiliary building supervisor was counselled on the proper use of clearance tags and this problem area was addressed in the Operations Supervisor's instruction book. The improper lifting of clearance tags was also addressed. The tags that were not filled out were removed or corrected.
- 4) To prevent recurrence, two new procedures were written to formally allow the use of information tags and cautions tags. AP 0103.3, Control of Operator Aids, addresses information tags and was distributed 05/30/84. The caution tag procedure has been written and is in the process of being reviewed.
- 5) Full compliance will be achieved on August 31, 1984.

### FINDING 2:

Technical Specification 4.8.1.c.6 requires verifying every eighteen months that the diesel generator completes an eight hour run and that the cooling system functions within limits during the eight hours.

Contrary to the above, the surveillance testing (OP 4304.3) which was conducted on April 19, 1984, to satisfy the above specifications was inadequate in that insufficient data was taken so that a complete evaluation of the cooling system could be accomplished.

**RESPONSE:**

- 1) FPL concurs with the finding.
- 2) The reason for the finding was that the procedure update associated with the Technical Specification amendment which called for a check of the cooling system performance received an inadequate review prior to implementation.
- 3) Corrective action taken was to perform a complete review of the emergency diesel generator testing requirements. This review was performed by Plant Staff, Power Plant Engineering, and an engine service representative. All procedures associated with engine testing and maintenance were reviewed to verify compliance with the Technical Specifications and the service representative's recommendations. The testing procedures were rewritten, additional engine instrumentation installed, and the emergency diesel generators successfully retested on May 9, 1984 and May 10, 1984.
- 4) The root cause for the finding was that an inadequate review of Technical Specification Amendments 82 and 76 was performed prior to implementation. Plant procedures for formalizing the Technical Specification change process to include proper review during implementation have been written. A tracking system has been developed which will ensure that all license amendment requirements will be met during the implementation process.
- 5) Full compliance was achieved May 10, 1984.

**FINDING 3:**

Technical Specification 6.8.1 requires that written procedures shall be established and implemented that meet or exceed the requirements of USNRC Regulatory Guide 1.33.

Contrary to the above, Operating Procedures (OP 0206.6), Hydrostatic Pressure Testing for Inservice Inspection Requirements, was not implemented in that relief valves were required to be listed and were not for the hydrostatic test of the Safety Injection System on April 17, 1984. Also, an adequate procedure for the same hydrostatic test was not established in that several requirements of the Quality Assurance Test Control Program were not addressed.

**RESPONSE:**

- 1) FPL concurs with the finding.
- 2) The reason for the finding was the failure of cognizant personnel to list the position of several boundary valves while performing an inservice inspection (ISI) hydrostatic test and the Operating Procedure (OP 0206.6, Hydrostatic Pressure Testing for ISI Requirements) did not adequately address the requirements established in the Quality Assurance Manual, procedure QP-11.4, Test Control Program, Section 5.2.4.

- 3) As corrective action, personnel were advised to list all boundary valves with condition of valves during hydrostatic testing and condition of valves when returned to service. No further problems were observed. Additionally, the procedure (OP 0206.6) is under review to identify areas that may need revising to satisfy the requirements delineated in the Quality Assurance Test Control Program.
- 4) To prevent recurrence, Section 5.4 was added to OP 0206.6 to provide calibration data for relief valves utilized for overpressure protection (incorporated under OTSC No. 2118) and Sections 8.7.1 and 8.9.1 were added to include instructions for overpressure protection, and identification and documentation of excessive, readily detectable, valve seat leakage (incorporated under OTSC No. 2127). Additionally, OP 0206.2 will be revised to reflect changes required in the areas identified by the procedure review performed in 3 above.
- 5) Full compliance will be achieved by August 31, 1984.