

84 AUG 15 P 1: 35



August 10, 1984  
L-84-200

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 83-24

We have reviewed the NRC letter dated July 5, 1984, which included the NRC staff evaluation of FPL's response to Inspection Report 83-24. As requested in that letter, a revised response is attached.

Should you or your staff have further questions on this information, please contact us.

Very truly yours,

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

JWW/RDH/PLP/js

Attachment

cc: Harold F. Reis, Esquire  
PNS-LI-84-275

8409240433 840829  
PDR ADDCK 05000250  
Q PDR

ATTACHMENT

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inspection Report 83-24

**FINDING**

Topical Quality Assurance Report FPL-NQA-100A Revision 5, requires that Quality Assurance records be retained in accordance with Quality Procedure (QP) 17.1., "The Collection and Storage of Quality Assurance Records" as a completed, signed, initialed or otherwise authenticated document that furnishes evidence of the quality of items and/or activities affecting quality.

Contrary to the above requirements, the following completed procedures are not being retained as QA records:

<u>PROCEDURE NO.</u>	<u>TITLE</u>
3101.1	Component Cooling System - Normal Operation
4103.1	High Head Safety Injection and Containment Spray Lineup for Automatic Operation
2101.1	CVCS - Charging and Letdown, Initial Valve Alignment
2601.1	CVCS - Boric Acid System Valve Alignment
2603.1	CVCS - Boron Concentration Control System
5503.1	Waste Disposal System - Gaseous Disposal System Operation
1300.1	Pressurizer Relief Tank Operation
2803.1	CVCS - Boron Recycle System - Operating Instruction
5510.1	Waste Disposal System - Operation of the Gas Analyzer and Gas Sampling Procedures
1004.5	Reactor Coolant Pressure Isolation Valve Leakage Testing

A re-evaluation and response was requested from FPL as described in a letter dated July 5, 1984, from Richard C. Lewis, NRC, to J. W. Williams, Jr., FPL.

## RESPONSE

In accordance with your request for a re-evaluation of our response to the original finding as described in IE Inspection Report 83-24 dated July 29, 1983, we have re-evaluated our position and the response is as follows:

- 1) Based on the re-evaluation, FPL concurs with the finding.
- 2) Procedures in existence at the time of the finding did not adequately address the FPL Topical Report requirements.
- 3) The following actions have been taken to ensure adequate implementation of the FPL Topical QA Report requirements: (a) as part of the independent verification program, procedures 1300.1, 2101.1, 2601.1, 3100.1, 4103.1, and 5503.1 are presently maintained in the Shift Nuclear Supervisor's file until completion of the next activity; (b) procedure 1004.5 is now considered a QA record and it shall be retained in accordance with Administrative Procedure 0190.14, Document Control and Quality Assurance Records; (c) since the finding, the individual blank lines in front of the steps in system alignment procedures have been converted to actual sign offs that the steps have been completed and independent verification sign offs have been added; and (d) procedures 2603.1, 2803.1, and 5510.1 will be reviewed for independent verification and record retention requirements as stated in the FPL Topical QA Report.
- 4) The Procedure Development Group of the Procedure Update Program will review each operating procedure issued for independent verifications and records requirements.
- 5) Full compliance will be achieved by October 1, 1984.