



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W.
 ATLANTA, GEORGIA 30323

Report Nos: 50-250/89-³⁶~~29~~ and 50-251/89-³⁸~~29~~

Licensee: Florida Power and Light Company
 9250 West Flagler Street
 Miami, FL 33102

Docket Nos: 50-250 and 50-251 License Nos.: DPR-31 and DPR-41

Facility Name: Turkey Point, Units 3 and 4

Inspection Conducted: July 10-13, 1989

Inspectors:	<u><i>[Signature]</i></u> For	<u>9/6/89</u>
	P. Holmes-Ray, Senior Resident Inspector	Date Signed
	<u><i>Albert B Ruff</i></u>	<u>9/6/89</u>
	A. Ruff, Reactor Inspector	Date Signed
Approved by:	<u><i>M V Sinkule</i></u>	<u>9/6/89</u>
	M. V. Sinkule, Chief Reactor Projects Branch 2 Division of Reactor Projects	Date Signed

SUMMARY

Scope:

This inspection was conducted to followup allegations that were submitted to the licensee in a letter from the NRC dated April 12, 1989, and responded to by the licensee in a letter June 5, 1989.

Results:

The inspection concluded that for the sixteen allegations reviewed on site that:

- Ten were substantiated. Of these ten, the licensee had been previously addressed and corrective actions had been or were being implemented by the licensee. No new safety significant safety issues were identified.
- In the areas inspected, no deviations or violations were identified. The inspectors concluded that no new safety issues were identified and all allegations addressed were considered closed.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *J. Arias, Jr., Assistant to Plant Manager
- *J. E. Cross, Plant Manager
- *R. J. Earl, QC Supervisor
- J. Ferrare, PDRT Supervisor
- *S. M. Franzone, Lead Engineer
- *K. N. Harris, Vice President
- E. Hayes, I&C Supervisor
- *D. W. Herrin, Regulation and Compliance Engineer
- *V. A. Kaminsas, Technical Department Supervisor
- R. Kelly, I&C Specialist
- B. Lazenby, I&C Specialist
- *G. L. Marsh, Reactor Supervisor
- *L. W. Pearce, Operations Supervisor
- P. Ross, Maintenance Supervisor
- P. Roy, Planning
- *G. A. Warriner, QC Corrective Actions Supervisor
- J. Wilkosk, Material Control Supervisor

Other licensee employees contacted during this inspection included supervisors, engineers, technicians, and administrative personnel.

NRC Region II Personnel

- *P. Holmes-Ray, Senior Resident Inspector, Crystal River
- *A. Ruff, Reactor Inspector
- *M. Sinkule, Chief, Reactor Projects Branch 2

*Attended exit interview

Acronyms and initialisms used throughout this report are listed in the last paragraph.

2. Followup of Allegations Units 3 and 4 (592701)

Approximately eighty-two allegations were received by the NRC in March 1989 concerning Florida Power and Light Company's Turkey Point Nuclear Plant. After conducting an in-office review to ensure that no immediate safety concerns were present, the majority of these allegations were referred to the licensee in a letter dated April 12, 1989. The licensee was requested to evaluate the concerns and respond only to the allegations which were found to be of a different nature from those to which the licensee had previously responded to in FPL letters to the NRC dated February 24, 1989, and May 10, 1989. The licensee evaluated the allegations and responded to twenty of the eighty-two allegations which

they found to be different in nature to those previously addressed. The inspectors reviewed the response and concluded that the response was adequate, based on the request; however, sixteen safety-related concerns were selected for on-site review to verify the adequacy of the licensee response and to ensure that no safety-related problems existed. For these sixteen allegations, the inspectors performed an on-site review. During this review, the inspectors determined whether the allegation was substantiated or unsubstantiated. For allegations that were substantiated, the inspectors made a determination of whether or not the concern had sufficient safety significance to warrant corrective action, and if so, had adequate corrective actions been taken to correct the concern.

The inspectors followed up on the allegations by performing discussions with managers, supervisors and craftsmen, as applicable, and by reviewing documents and records. The concern number used in this report is the NRC internal tracking number. The concern number in parenthesis is the FPL tracking number.

2.1 Concern 10 (FPL No. 4-2)

This concern as stated by the allegor is:

"The job planner indicated in Step #1 of the PWO work description to obtain a new temperature indicator M&S 760-259665-2. The job planners check sheet indicates that the planner verified the availability of the required parts in stores on October 18, 1988. As documented on Form 219N, the required part was not available in stores and therefore this job could not be completed. The Turkey Point Plant has for years, experienced a severe replacement parts problem which continues to hamper plant equipment repair and availability."

Reference: Plant Work Order WA 8810 1618 4710
Planner's Check List

Discussion

The inspector reviewed the referenced PWG, dated October 16, 1988, and the planners check list dated October 18, 1988. The PWO was written to replace a temperature indicator in the safety related component cooling water system. The PWO was written on October 16, 1988 but the work was not scheduled for performance until November 20, 1988 and was then stopped due to unavailability of parts. The job was completed December 4, 1988. The instrument was out of service from October until December 1988; however, this did not result in the plant being operated in a degraded mode since this indicator provides no safety function. A review of the planner's check list revealed that the planner did initial off that the required parts were available and attached the requisition form to the PWO on October 18, 1988. An interview with the planner disclosed that the method used to determine parts availability only determined if parts were

available but did not reserve the parts for a specific PWO. The planner stated that the parts were available when he signed the checklist.

This concern is analogous to Concern 2 (poor planning) and Concern 4c (spare parts) that are discussed on page 11 and 13 in NRC Report 50-250,251/89-13 dated May 8, 1989.

Conclusion

The concern was substantiated, however, no safety issues were identified. The inspector discussed with licensee management that assigning parts to a specific PWO when the planning check for availability is made may improve the program. This concern is considered to be closed.

2.2 Concern 21 (FPL No. 4-4A/B)

These concerns as stated by the allegor are:

- "1. Poorly planned job as a clearance was required but not planned into the job and resulted in extensive work delays.
2. The field supervisor gave verbal direction to his crew to manipulate the system isolation valves. However, operations personnel refused permission for the workers to manipulate the valves and insisted on an equipment clearance. Apparent communication problems between department supervision and a poor understanding of plant policies relating to valve manipulations, resulted in extensive work delays."

Reference: Plant Work Order WA 8809 12150648

Discussion

The inspector reviewed the completed PWO, which was dated September 12, 1988, and had discussions with FPL representatives on this item. The inspector determined that this PWO was for the periodic instrument loop calibration that is associated with instrument PT-4-1601, LP Turbine Steam Supply Transmitter. This transmitter is not safety related. The calibration was scheduled for outage work and was performed during the outage with the plant in a safe shut down condition. The calibration was performed in accordance with procedure MI-72-016, Calibration Reheat Steam to Low Pressure Loop, P-1601, dated October 27, 1988. This review confirmed the above concerns in that they were documented in JWR of the PWO.

Concern 1 above is analogous to Concerns 2 and 4d (poor planning) that are discussed on pages 11 and 14 in NRC report 50-250,251/89-13 dated May 8, 1989. Concern 2 above is also analogous to several concerns (No. 28b., page 64; No. 2, page 11; and No. 5, the 3rd paragraph on page 17 - clearance procedure problems, manipulation of isolation valves, and coordination between departments.) discussed in the same NRC report.

Conclusion

The concerns were substantiated. The work was done on a non-safety related system during a safe shutdown condition when the plant was in an outage. There was no safety issue identified. The licensee did not respond to these concerns. This item is considered closed.

2.3 Concern 25 (FPL NO. 4-5)

This concern as stated by the allegor is:

"Due to a procedure error with ADM-701, a Plant Work Order could not be manually generated. Initiated an OTSC On the Spot Change to ADM-701 however, AP 0109.3 itself had instruction errors. Initiated OTSC #6114 on AP 0109.3 and OTSC #6115 on ADM-701. PUP Procedure Upgrade Program personnel refused to accept the OTSC on ADM-701 and disagreed with the changes. To my knowledge no NCR report was initiated by the licensee to address procedure violation for a 2 year period."

Reference: Plant Work Order WA 8808 2011 1930

Discussion

The inspector reviewed the referenced PWO and asked the licensee for a copy of OTSC 6114 and 6115. A copy of OTSC 6114 was provided for review, but OTSC 6115 was not in the licensee's files. The licensee stated that OTSC 6115 was never accepted nor processed, therefore, no copy was filed. Since OTSC 6115 was not available, the precise change requested by the allegor could not be determined. The concern did not state the specific change to ADM-701 that the allegor requested and the licensee rejected.

The need for a change to ADM 701, Plant Work Order Preparation, dated August 5, 1988, could not be substantiated since a copy of the revision of ADM 701 that was in use at the time of the referenced PWO was reviewed and step 5.1.4 states, "When the NJPS computer is down, the PWO should be originated on a hard copy of Form 1784N (Attachment 5) and entered into the NJPS computer when the computer is available." The inspector concludes that no procedure change to ADM-701 was required and, therefore, no procedure violation occurred. With no procedure violation, no NCR was required.

The inspector reviewed OTSC 6114, which requested a change to the instructions for processing the Request For Procedure Review, Form 5714A, which the allegor apparently thought was part of procedure AP-0109.3 On The Spot Changes To Procedures, dated May 26, 1988. The licensee made the change to Form 5714A as stated in OTSC 6114; however, after further review, the change was cancelled by OTSC 6118. OTSC 6118 stated that the reasons for cancelling the change to Form 5714A was that the requested change was not valid or necessary and Form 5714A was not part of AP-109.3. The inspector determined that the requested change on OTSC 6114 was not necessary. Therefore, actions taken by the licensee were appropriate.

Conclusion

The concern is not substantiated. The licensee did not respond to this concern. No plant safety issues were identified. No NRC regulations were found to be violated. This item is considered closed.

2.4 Concern 30 (FPL 4-6)

This concern as stated by the allegor is:

- "1. Equipment tech manual was not specified in the job package nor could it be physically located.
2. Plant procedure 3-PMI-067.7 was found to contain errors and therefore the job was stopped. Numerous poorly written procedures have consistantly plagued the Turkey Point Plant and are responsible for extensive work delays and PWO backlogs."

Reference: Plant Work Order WA 8808 3003 4630
Plant Procedure 3-PMI-067.7

Discussion

The inspector reviewed procedure 3-PMI-067.7, Process Radiation Monitoring System CH R-3-20 Calibration Procedure, dated January 15, 1987, and determined that the procedure was written in a detailed manner such that the technical manual was not needed to perform the work. The technical manual was referenced in the procedure (paragraph 2.1.3) and the inspector was able to obtain the manual from document control.

The second part of this concern deals with poorly written procedures. The specific procedural deficiency was not stated by the allegor and therefore could not be reviewed. The adequacy of maintenance procedures is analogous to Concern No. 3 discussed in detail on pages 26-29 in NRC Report 50-250,251/89-13 dated May 8, 1989. No further inspection was done on this allegation.

Conclusion

Concern 1 is not substantiated. No safety issues were identified. No NRC regulations were violated. This item is considered closed.

The specific concern with procedure 3-PMI-067.7 could not be substantiated since no details of procedural deficiencies were provided. An indepth review of the larger issue of numerous poorly written procedures at Turkey Point Plant was documented in paragraph 3.3 of NRC report 50-250,251/89-13 dated May 8, 1989. No safety issues were identified and no NRC regulations were found to be violated. This item considered closed.

2.5 Concern 93 (FPL No. 4-12)

This concern as stated by the allegor is:

"As evidenced on this document, the job planner failed to require an equipment clearance on this job which resulted in extensive work delays which ultimately increases the PWO backlog and therefore decreases overall department productivity."

Reference: Plant Work Order 8808 7142 6

Discussion

The inspector reviewed the PWO and the concern and determined that this concern is analogous to Concern 28d, page 65-66 in NRC report 50-250,251/89-13 which discusses job planning and operations right to require a clearance at the discretion of the SRO. The job was planned on February 26, 1988 and the planner determined that no clearance was required to calibrate the pressure indicator. Operations department may require a clearance at any time for administrative control. On May 9, 1988, when the job was started Operations at that time required a clearance.

Conclusion

This concern is substantiated, however no safety issues were identified. No NRC regulations were violated. This item is considered closed.

2.6 Concern 103 (FPL No.4-13)

This concern as stated by the allegor is:

"This Safety-Related PWO requires that all parts used in the repair of the plant equipment be qualified parts and so identified and approved by the Quality Control Department. The journeymen on this job failed to secure qualified, inspected, and approved replacement parts and, therefore, an NCR should have been initiated."

Reference: Plant Work Order WA 8804 2101 3614

Discussion

The inspector reviewed the completed PWO and had discussions with FPL representatives on this item. This PWO was to trouble shoot and correct an erratic SR indication (termed spiking). Since the WI SR indicators are sensitive to electromagnetic and electrostatic noise, spiking can occur. This is because of the high impedance circuits and the low level signals in the millivolt range. The JWR states that an "O" ring was missing in a connector and was considered to be the cause of the spiking. An "O" ring for this particular installed connector and the connector itself were no longer available from the plant stored spares. However, a new type connector was available as a replacement. This new connector was covered by RIR R87-6174. It was obtained and installed in the system in

accordance with proper instructions and documentation. This RIR No. was recorded by the Journeyman in the JWR.

The NRC inspector did further investigations into the RIR and its material and determined that the new connector was properly inspected and authorized for the job. In 1986 Westinghouse issued a Technical Bulletin NSID-TB-86-01 recommending several actions to improve the reliability of the NIS. This Technical Bulletin listed a new replacement for the old installed connectors. RIR No. R87-6174 covered this new connector which was installed by the subject PWO and was recorded in the JWR.

Conclusion

This concern was not substantiated. The correct part was installed and it was covered by QC RIR. The licensee did not respond to this concern. This item is considered closed.

2.7 Concern S-1 (FPL No. 4-19)

This concern as stated by the allegor is:

"Poor planning - an equipment clearance was required on this job but was not planned into the job.

Poor planning - PWO work description instructed the worker to set the air supply utilizing the throw away gauge on the installed equipment rather than requiring the use of a calibrated test gauge.

Poor planning - Post Maintenance Testing should have included testing for equipment air leakage."

Reference: Plant Work Order No. 048196

Discussion

The inspector reviewed the completed PWO and discussed with FPL the concerns indicated above. All three items are associated with poor planning and were confirmed by the journeyman's statements recorded in the JWR. The work involved the calibration of a pressure gauge for ASCO Solenoid Valve SV-3-2201 in the air system. This concern is analogous to Concern 2 discussed in NRC's Report 50-250,251/89-13 dated May 8, 1989.

The work was ultimately done with a clearance and a calibrated test gauge. The PWO did require the journeyman to verify the stability of the system's installed pressure gauge after completion of work but an air leakage post maintenance test was not called for as part of the PWO. The NRC inspector determined that the stability check satisfied the licensee's PMT. It is the NRC inspector's opinion, however, that for completeness and documentation purposes that a post maintenance air test should have been a part of the PWO's PMT. (i.e., After the test gauge was removed, a post maintenance air leak test at normal system pressure should have been made

on that portion of the system that was disturbed or disassembled as a result of the journeyman's work in performing the calibration of the system gauge.) This type of PMT was discussed with FPL representatives and it was being considered as an enhancement to their PMT program.

Conclusion

This concern was substantiated, however, there was no safety issue identified. The licensee did not respond to this concern. This item is considered closed.

2.8 Concern S-6 (FPL No. 4-20)

This concern as stated by the allegor is:

"Non-qualified parts used on a Safety Related system"

Reference: Plant Work Order 050226
Equipment: CV-3-1607, Atmospheric Steam Dump Valve

Discussion

This concern was one to which the licensee responded in a letter dated June 1, 1989. The inspector reviewed the referenced PWO and the licensee's response. Discussions were held with licensee personnel cognizant of this issue and the concern. The inspector determined that in 1986, when this PWO was worked, the gasket in question was not designated as Q material and was installed as non-Q. The positioner for CV-3-1607 was, in 1986, not considered seismic and, therefore, not required to be treated as a Q component. Today, due to a change in requirements, the positioner is considered seismic and the gasket is procured as a Q part. The licensee's response is considered adequate.

Conclusion

This concern is substantiated, however, no safety issues were identified. No NRC regulations were violated. The licensee's response was adequate. This item is considered closed.

2.9 Concern S-18 (FPL 4-22)

This concern as stated by the allegor is:

"Poor job planning

Installed equipment valve number conflicts with plant documents - instrument index

Poor Quality Control practices in their review of this work package and subsequent approval."

Reference: Plant Work Order 046863
Equipment: SV-258

Discussion

The inspector reviewed the completed PWO, which was dated January 1986 and other documents associated with the concern. Discussions were also held with FPL representatives on this item. This PWO was issued for the investigation and repair of a seat leak on VCT Vent to Vent Header Isolation Valve SV-258. Step 2 of the PWO stated that if leakage was present, the solenoid valve was to be rebuilt or it was to be replaced. Apparently, the planner believed the valve to be installed in the system with union connections. It was, however, welded into the system. When this fact was identified, by the journeyman, the PWO statement was changed to state that the solenoid valve was to be rebuilt in place. This valve is not nuclear safety related. The job was scheduled as refueling outage work and was performed during a 1986 outage with the plant in a safe shutdown condition.

The poor planning concern for this job was substantiated. This concern is analogous to Concern 2 that is discussed on page 11 in NRC Report 50-250,251/89-13 dated May 5, 1989.

The concern for the valve number conflicting with the Instrument Index was also substantiated. This valve number has been corrected by the licensee as a result JWR comments. In addition, as a result of the conditions described in the JWR, the Technical Department has researched the model number of the ASCO valve and determined that model number 8210C88 had taken the place of the obsolete model number 8210A88 as listed in the Instrument index. The Instrument Index will be corrected in accordance with schedule listed in FPL's letter L-88-521, dated December 9, 1988, to the NRC. That is, all safety related control room drawings will be updated by the end of 1989. All other safety related drawings will be updated by June 1990.

The poor QC practices in review and approval with regard to this PWO could not be determined due to the lack of specificity by the allegor. The reviews by the QC inspectors were considered to meet the administrative and QC requirements of ADM-701 that was in effect at the time the PWO was reviewed and performed.

Conclusion

This concern was partially substantiated. There were no safety issues identified and the job was completed satisfactorily with the plant in a safe shutdown condition. The licensee's response to this concern was adequate and this item is considered closed.

2.10 Concern S-30 (FPL 4-23)

This concern as stated by the allegor is:

"Post Maintenance testing was required on this job by the Quality Control Department, however, the I&C supervision did not require such testing."

Reference: Plant Work Order 793737
Equipment: Steam Generator Blowdown

Discussion

The inspector reviewed the completed PWO, dated December 1985, and other documents associated with the concern. Discussion were also held with FPL representatives on this item. This PWO was issued for the periodic calibration of local SG blowdown temperature indicators. These indicators are not nuclear safety related and calibration was scheduled and performed during an outage with the plant in a safe shutdown condition.

The PWO states "Retest per App F, AP 0190.28." Appendix F is a form in the Administrative Procedure for PMT. AP 0190.28, dated November 11, 1985, states in paragraph 8.1.4.1. "Electrical and I&C maintenance shall list all required postmaintenance testing on Appendix F."

All these temperature indicators were satisfactorily calibrated including those that were defective and replaced. In that the PWO already included applicable checks and calibrations, the I&C supervisor indicated "none" on Appendix F form in the testing required space.

Conclusion

The concern was not substantiated in that procedures were followed and the successful calibration proved the acceptance of the local instruments. PMT was discussed with FPL representatives and enhancements are being considered in this area. There were no safety issues identified and the job was completed with the plant in a safe shutdown condition. The licensee's response to this concern was adequate and this item is considered closed.

2.11 Concern S-45 (FPL 4-24)

This concern as stated by the allegor is:

Concerns:

"Post-maintenance testing was required by the plant's Quality Control Department; however, the I&C supervision did not require such testing."

Reference: Plant Work Order 793707
Equipment: PI-404, 405

Discussion

The inspector reviewed the completed PWO, dated December 1985 and other documents associated with the concern. Discussions were also held with FPL representatives on this item. This PWO was issued for the periodic calibration of Reactor Coolant System pressure indicators (PI-404 and PI-405). These instruments are located outside of the biological shield wall and are used for local indication only. The calibration was scheduled and performed during an outage with the plant in a safe shutdown condition. Calibration was performed in accordance with the MI 41-033.

The PWO states "Retest per Appendix F, AP 0190.28" Appendix F is a form in the Administrative Procedure for PMT. A blank Appendix F form was attached to the PWO. AP 0190.28, dated 11/13/85 states in paragraph 8.1.4.1, "Electrical and I&C maintenance shall list all required postmaintenance testing on Appendix F."

These pressure indicators were satisfactorily calibrated. In that the PWO already included applicable checks and calibrations, the I&C supervisor indicated "Completed Cal-Sheets" on Appendix F form in the testing required space.

Conclusion

The concern was not substantiated in that procedures were followed and the successful calibration proved the acceptance of the local instruments. This concern is analogous to Concern S-30 which is discussed above. There were no safety issues identified and the job was completed with the plant in a safe shutdown condition. The licensee's response to this concern was adequate and this item is consider closed.

2.12 Concern S-69 (FPL No. 4-26)

This concern as stated by the allegor is:

"Procedure violation - procedure time limits were exhausted - I&C supervisor gave verbal direction to continue work in conflict with the procedure. Additionally, the Quality Control Department, also was aware that the procedure was going to be violated."

Reference: Plant Work Order 793633
 Equipment: NIS Intermediate Range Compensation

Discussion

The inspector reviewed the PWO, Maintenance Procedure 12207.1 (Intermediate Range Nuclear Instrumentation Compensating Voltage Adjustment dated December 15, 1983), and interviewed QC and I&C specialists to determine the validity of this concern. Also, Technical Specifications were reviewed to ascertain if a TS requirement was applicable.

The procedure calls for the compensation to be completed within one hour of reactor shutdown. Interviews with I&C specialists indicated that both channels can be compensated in accordance with the procedure within the time restraints if one is familiar with the procedure and equipment. The alleged stated in the journeyman's work report for PWO 793633 that he had never performed the procedure before and had to "continuously obtain direction". Therefore, he did not complete the procedure within the time restraints. In discussion with a Reactor Engineering supervisor it was determined that it is desirable to perform the compensation each shutdown but the required frequency is every 18 months. The inspector reviewed the performance history of this procedure and determined that the performance in question was not required to meet the 18 month frequency. Also, this compensation is not a TS requirement. The procedure was not violated in that it was not completed but was not performed improperly. Step 9.1 Note reads in part, Inform your supervisor if one or more channels cannot be compensated and complete Section 9.20. The alleged had completed the time dependent steps of the procedure for one channel when he ran out of time. The remaining steps for that channel were to adjust the compensating voltage based on the data previously taken. When the supervisor was informed, in accordance with the note in step 9.1, that the technician had run out of time to complete the procedure he instructed the technician to complete the non-time dependent steps for the channel, that data was taken. This is not a procedure violation since the note in 9.1 satisfies this situation. The allegation that QC was aware that the procedure was "going to be violated" could not be followed up since the QC person involved was no longer with FPL and therefore was not available for interview.

Conclusion

The allegation that the procedure was not completed within time restraints is substantiated; that there was a procedure violation is not substantiated; and that the verbal instructions given by the supervisor were in conflict with the procedure is not substantiated. The QC involvement could not be determined. The error made in this issue was assigning an inexperienced I&C technician to perform a time dependent job. In NRC report 50-250,251/89-13, page 15, Summary of Concern Nos. 4a, 4b, 4c 4d and 4f, and Concern No. 5 commencing on page 16, the issue of maintenance planning is discussed in detail. No safety issues were identified and no NRC regulations were violated. This item is considered closed.

2.13 Concern S-95 (FP&L 4-30)

This concern as stated by the alleged is:

"Safety-Related System - Priority 'A' PWO written on August 24, 1985, was not issued until November 24, 1985, because the licensee wanted to keep the unit on-line. Crisis management."

Reference: Plant Work Order 010079 Equipment: CV-4-2901

Discussion

The inspector reviewed the completed PWO and other documents associated with the concern. Discussions were also held with FPL representatives on this item. The PWO was issued to investigate and repair, if necessary, CV-4-2901 in that it would not close. The PWO stated that cold shutdown plant conditions were required for this job.

This job was initially worked on August 24, 1985. The deficient condition was corrected, the valve was closed, and the system was returned to service. FPL stated and it was confirmed by the inspector that this PWO was worked twice due to administrative problems with the older manual PWO system. At the time of this issue, the PWO consisted of several identical copies, some of which were used as work documents, some for administrative purposes, and some of which were filed. These identical copies are designated Part 1, Part 2, and so forth. Part 2 of the work order, which is an exact duplicate of Part 1, was the copy that was used for the August 24, 1985, work. The JWR on Part 2 states, "Check DPS 2901 and found it reading just above 0. Vented the pressure switch and found several pieces of rust coming out. Flushed for several minutes causing the valve to close. Cycled the valve several times to confirm operations. Release to OPS." Part 2 of the PWO was satisfactorily closed on August 24, 1985. Due an administrative error, Part 1 of the work order was re-issued and worked on November 24, 1985.

Conclusion

The concern was not substantiated. In essence the job was worked twice with no adverse consequences. There was no delay in the initial implementation of the PWO. The licensee's response to this concern was adequate and this item is considered closed.

2.14 Concern S-107 (FPL No. 4-33)

This concern as stated by the allegor is:

"Extremely poor planning - Safety Related System - a procedure should be utilized to ensure proper work performance.

Lack of inter-department coordination and inter-department communication."

Reference: Plant Work Order 041923 Equipment: AFW Pump C

Discussion

The inspector reviewed the PWO and the special procedure, SP 85-05, AFW Governor Test Pump C, referenced in the PWO. This concern involves work performed in 1985 that apparently was poorly planned and lacked procedural guidance. This concern is analogous to concerns 2, 4 and 5 that are discussed on pages 11 - 18 in NRC report 50-250,251/89-13 dated May 8, 1989.

Conclusion

The concern is substantiated. This job was to hookup test equipment for a special test of the AFW pump governor. A review of the JWR indicates the coordination between the I&C shop and the Electric shop was poor. The recorder to be hooked up was not prepared for installation prior to the start of the work. A procedure existed, therefore, the allegation that no procedure existed is not substantiated. This job was not well planned nor was it well coordinated. As it turned out, the test was not run so the test equipment was removed, returned to the calibration lab and the PWO was closed. This concern is one of poor planning and coordination efficiency and not a safety issue. No NRC regulations were violated. This item is considered closed.

2.15 Concern S-167 (FPL 4-42)

This concern as stated by the manager is:

"Quality Control required post maintenance testing, however, the I&C supervision did not.

Reference - RII-88-A-0066 Attachment # 10 micro-switch set point is different on documents: MI-41-002
Instrument Index
Stick Prints I&C

Note: All of these documents are controlled and each one differs regarding this set point. Which one is correct?"

Reference: Plant Work Order 793664
Equipment FIC 490, 491, and 492

Discussion

The inspector reviewed the completed PWO and other documents associated with the concern. Discussions were also held with FPL personnel on this item. The PWO was issued in January 1986 to do a periodic calibration of the RTD bypass flow loop indicators. The PWO indicated that this was outage work and was to be performed in accordance with MI 41-002. The MI had the proper setpoint listed for these instruments.

The PMT testing concern is analogous to concerns S-30/S-45 that are discussed above. The calibration was performed satisfactorily in January 1986. In that the calibration was satisfactory, App F (Post Maintenance Testing form from AP 0190.28 dated January 13, 1985) that was attached to the PWO indicated that no testing was required.

The setpoints on the three documents mentioned above (MI-41-002, Instrument Index, applicable I&C stick prints) did not agree, however, the setpoint listed in MI-41-002 was correct. These setpoint changes were

implemented in accordance with setpoint changes 48 through 53 and involved no setpoints delineated in the TS. The licensee identified the drawing discrepancy on NCR 89-0061, dated January 1989. A DEEP 89-102 has been issued to correct this discrepancy. The Instrument Index and other drawing will be corrected in accordance with the schedule listed in FPL's letter L-88-521, dated December 9, 1989, to the NRC. That is, all safety related control room drawings will be updated by the end of 1989. All other safety-related drawings will be updated by June 1990.

Conclusion

The concern was substantiated in part (setpoint discrepancies), however, no safety issues were identified. The calibration proved the acceptance of the instruments and the setpoints listed in the MI were correct. The licensee's responded to the PMT concern and it was adequate. The setpoint discrepancy was not addressed in the licensee's response. This item is considered closed.

2.16 Concern S-177 (FPL No. 4-43)

This concern as stated by the allegor is:

"Poor plant procedures.-Job Planning

Radiation Work Permit required the use of a respirator and the worker assigned to work the job was not respirator qualified and therefore could not perform the job. Poor job planning as far as supervision knowing the job requirements and their crews qualifications."

Reference: Plant Work Order WA 8804 4130 2613
Equipment: FI-3-127

Discussion

The inspector reviewed the PWO and procedure O-PMI-047,57, Chemical and Volume Control System RCP B Seal Injection Flow Indicator Calibration/Replacement, and determined that a procedure change was required and that a respirator was required to be worn for the job. Since the allegor was not qualified to perform work in respiratory equipment, this job was assigned to another journeyman who was respirator qualified and he completed the job satisfactorily. This allegation is analogous to concerns 2, 4 and 5 that are discussed on pages 11 - 13 in NRC report 50-250,-251/89-13 dated May 8, 1989.

Conclusion

This concern is one of job planning efficiency and is substantiated, however, no safety issues were identified. No NRC regulations were violated. This item is considered closed.

B
J M

NRC EXIT MEEETING MINUTES

Date: July 13, 1989

SUBJECT: EMPLOYEE CONCERNS (NIR 89-13 FOLLOWUP)

Attendees:

K. H. Harris	G. A. Warriner	P. Holmes-Ray (Sr. Res. Insp.-NRC)
J. E. Cross	V. A. Kaminskas	A. B. Ruff (Rx Insp.-NRC)
L. W. Pearce	S. M. Franzone	M. V. Sinkule (Branch Chief-NRC)
J. Arias, Jr.	G. L. Marsh	R. J. Earl
D. W. Herrin		

The subject of this exit will be covered in ~~inspection Report 50-250,251/89-36.~~
The inspector identified no violations, inspector followup items (IFI) or unresolved items (URI).

A total of 82 allegations were placed into two categories. Category 1 contained 20 allegations for which FPL had provided a response to the NRC. Category 2 contained 62 allegations which FPL took credit for being identified prior to the formal allegation.

The inspectors selected 6 Category 1 and 10 Category 2 allegations for review based on potential safety significance. Of these 16 allegations, 8 were substantiated, 8 could not be substantiated, and none were determined to have a significant impact on safety.

Although the inspectors were pleased with FPL efforts to address the allegations selected for review and considered them to be closed issues, they did have one comment and two observations.

COMMENT

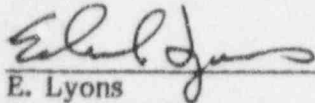
Category 1 Item 4-42-B questioned a correct instrument setpoint in the Instrument Index. This item was referred to a previously identified concern questioning the correct model number of the instrument. The concerns are not identical but the corrective actions taken by FPL addressed both issues.

OBSERVATION #1


Although job planners indicate availability of parts for implementing a task, lack of a Parts Dedication Program may lead to unavailability of those parts at a later date when the task is to be performed.

OBSERVATION #2

The term "Post Maintenance Test" appears to have different connotations to various plant personnel. Consideration should be given to developing a standard definition for this term to reduce confusion.



E. Lyons
Supervisor (acting)
Regulation and Compliance Group



EL:DH:lf

Distribution: Exit Attendees D.A. Chaney
 C. L. Mowrey R.J. Stevens
 J.W. Anderson RCG Files