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January 18, 1985
L-85-36

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 84-34/35

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-85-032-1

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PDR ADOCK 05000250
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ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket No. 50-250, 50-251
IE Inspection Report 250-84-34 and 251-84-35

FINDING 1:

Technical Specification (TS) 6.8.1 requires that written procedures and administrative policies shall be established, implemented, and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7 and Appendix A of USNRC Regulatory Guide 1.33.

Section 9 of Appendix A of USNRC Regulatory Guide 1.33 recommends that maintenance that can affect the performance of safety-related equipment should be performed in accordance with written procedures, documented instructions or drawings appropriate to the circumstances.

Contrary to the above, as of October 10, 1984, adequate maintenance procedures or instructions had not been established in that:

- a. Component Cooling Water heat exchangers were drained and subsequently filled without benefit of procedures or instructions.
- b. Component Cooling Water heat exchangers were hydro-blast cleaned without benefit of procedures or instructions.
- c. Leaking Component Cooling Water heat exchanger tubes were plugged and subsequently leak tested without benefit of procedures or instructions.
- d. General leakage testing was accomplished on Component Cooling Water heat exchangers without benefit of procedures or instructions.
- e. Unit 4 intake cooling water basket strainers were cleaned without benefit of procedures and/or instructions.

RESPONSE:

1. FPL concurs with the finding.
2. The reason that the activities identified in Items a. through e. of the NRC finding, were not implemented using written procedures and/or instructions, was that these activities were considered to be within the mastery of a journeyman. In addition, the Apprentice Training Program and certain other maintenance procedures generically address some of the activities identified in the violation items a. through e.
3. Two new maintenance procedures (i.e., separate procedures for Units 3 and 4) for the Component Cooling Water Heat Exchangers, have been developed and will shortly be approved for use. These procedures address the normal maintenance activities, which are performed on the Component Cooling Water Heat Exchangers and specifically address the following:

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- a. The draining and filling of the Heat Exchangers;
- b. The low pressure fresh water flush and hydrolazer flush of the Heat Exchangers;
- c. The plugging of Heat Exchanger Tubes, and the subsequent leak detection test to verify the adequacy of plugging activities; and
- d. The general post-maintenance leak testing of the Heat Exchangers.

In addition to these procedures, two new Plant Maintenance Instructions have been approved. One addresses the maintenance on the Component Cooling Water Heat Exchangers and includes those activities identified above for the new Component Cooling Water Heat Exchanger Procedures. The other new Maintenance Instruction addresses the cleaning of the Intake Cooling Water Basket Strainers.

4. Long term corrective measures to ensure that procedure deficiencies on a generic basis are identified and corrected, will be addressed by the Procedure Upgrade Program. Among the objectives for this program is the systematic evaluation of the adequacy of existing plant procedures and instruction, and the need for new procedures and instructions.
5. Full compliance through the implementation of the new procedures and instructions, identified in Item 3 above, will be achieved by February 17, 1985.

FINDING 2:

TS 6.8.3 requires that temporary changes to the procedures required by TS 6.8.1 only be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a senior operators' license on the unit affected.
- c. The change is documented, reviewed by the Plant Nuclear Safety Committee (PNSC), and approved by the Plant Manager-Nuclear within 14 days of implementation.

Contrary to the above, on October 2, 1984, several steps were deleted from Maintenance Procedure (MP) 3207.2, "Residual Heat Removal Pump Disassembly, Repair, Seal Replacement and Assembly". The deletions constituted a temporary change to a procedure required by TS 6.8.1, which was not:

- a. Approved by two members of the plant management staff.
- b. Reviewed by the PNSC and approved by the Plant Manager-Nuclear within 14 days of implementation.

RESPONSE:

1. FPL concurs with the Finding.
2. The reason for the Finding was that the Maintenance Procedure MP 3207.2 was used to perform specific one-time-only repair work on a Residual Heat Removal Pump seal, which did not require the application of all procedural steps. The non-applicable steps were identified on the Plant Work Order (PWO) and the deletion of non-applicable steps contained in specific plant maintenance procedures were approved by Plant Management.

3. Plant Management has reevaluated the requirements for procedural compliance and has issued a directive memorandum to all members of the plant management staff.

The directive states that incorporating non-applicable (NA) or not performed (N/P) in a step of a procedure constitutes a change to the procedure; therefore, an on the spot change (OTSC) written and approved in accordance with AP0109.3 (On the Spot Changes to Procedures) shall be generated. If a specific step in an approved procedure authorizes the use of N/A for a defined condition, and OTSC is not required or if the PWO authorizes entry into a specific section of a procedure, an OTSC is not required.

AP0109.3 requires that changes to procedures, which do not change the intent of the procedure, become effective after: (1) Approval by two members of the plant management staff; (2) the change is documented and reviewed by the Plant Nuclear Safety Committee; and (3) the Plant Manager approves the OTSC within 14 days of the implementation of the change.

4. The long term corrective measures will involve a revision of all Plant Maintenance Procedures by the Procedure Upgrade Program (PUP) Group, for those procedures, which contain generic procedural statements, which would allow the deletion of any procedural steps. These generic non-applicability statements in maintenance procedures will be removed. However, an individual step in an approved maintenance procedure may authorize the deletion of that step under very specifically defined conditions. These types of non-applicability provisions in maintenance procedures will continue to be allowed for use during maintenance work, provided that their limited useage is clearly defined in the procedure and approved in advance pursuant to Administrative Procedure AP109.3. All other on-the spot changes will be processed and approved in accordance with Administrative Procedure 0109.3
5. Implementation of the Plant Management Memorandum Directive, identified in Item 3 above, began on January 8, 1985. The long term revisions to the appropriate maintenance procedures will be completed by the PUP Group by the end of 1986.

FINDING 3:

TS 6.8.1 requires that written procedures and administrative policies shall be established, implemented, and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7 and Appendix A of USNRC Regulatory Guide 1.33.

Section 5.1.6 of ANSI N18.7 requires and Section 9 of Appendix A of Regulatory Guide 1.33 recommends that maintenance that can affect the performance of safety-related equipment be performed in accordance with written procedures, documented instructions, or appropriate drawings.

Contrary to the above, between October 1 and October 4, 1984, written procedures were not implemented during the repair of the 4B residual heat removal (RHR) pump in that:

- a. The requirements of on-the-spot change No. 2541 to MP 3207.2 were not incorporated into step 9.5 of the procedure.
- b. MP 0707.33, "Snubber Removal and Replacement," was not utilized to remove and replace snubbers attached to the pump.

- c. The requirements of Administrative Procedure (AP) 0190.10, "Cleaning of Nuclear Safety Related Systems and Components," were not followed in that a flange in the safety-related component cooling water supply to the RHR system was not protected from foreign material contaminants, as required by Section 8.1.1.5 of the procedure.

RESPONSE:

1. FPL concurs with the Finding.
2. Personnel oversight was the reason for each of the three specific Findings in which plant procedures were not implemented. In the case of Item b. above, the Maintenance Procedure MP 0707.33 was not identified for use during the prework Plant Work Order (PWO) review. In the case of Item c. the Component Cooling Water flange was disconnected without the initiation of the proper documentation.
3. The on-the-spot change No. 2541 has been incorporated into Step 9.5 of the Maintenance Procedure MP 3207.2, which addresses the removal of safety related snubbers. Maintenance foremen and supervisors have been counseled about activities, which do not conform to the requirements of the Procedure AP 0109.10, especially concerning the cleanliness precautions contained in this procedure.
4. A reference to MP 0707.33, "Snubber Removal and Replacement", will be added to the Maintenance Procedure MP-3207.2 for the removal of safety related snubbers.
5. A procedure change to revise MP 3207.2, as described in Item 4 above, will be implemented by February 17, 1985.

FINDING 4:

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be prescribed by procedures, documented instructions or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures, instructions or drawings.

The Licensee Quality Assurance Topical Report, Section 5.2, Revision 3 and Quality Procedures 5.1, Revision 3 and 6.6, Revision 4, implement these requirements.

Contrary to the above, between May 1984 and October 10, 1984, the licensee failed to address a condition adverse to quality by not establishing procedures, instructions or drawings describing approved methods of interfacing the Unit 4 nitrogen capping system with the Unit 4 Auxiliary Feedwater System.

RESPONSE:

1. FPL concurs with the Finding.
2. The reason for the Finding was personnel oversight, because this infrequently used system and its' connections were not identified for inclusion into the appropriate Drawings.
3. Plant Operating Drawings 5610-T-E-4062, Sheet 3 and 5610-T-E-4061, Sheet 2 were updated to properly reflect the Unit 4 nitrogen capping system interface with the Unit 4 Auxiliary Feedwater System.

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4. Turkey Point Plant has procedural requirements for systematically updating affected drawings, as a result of plant changes and modifications (PCM). When deficiencies are discovered during the normal system walkdowns as part of preoperational testing, a "Startup Field Report" is generated detailing as found deficiencies and is then processed via the Engineering Drawing Update organization.

In addition, administrative controls are in place to control the using and updating of plant drawings. These controls offer a systematic approach for any individual that discovers a discrepancy on plant drawings and the proper handling until resolution of such discrepancies.

5. Full compliance was achieved on October 31, 1984 by completion of actions described in Item 3 above.