

2/6/84

Note to: Dan McDonald

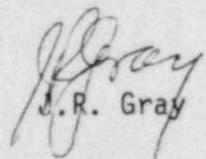
From: J. Gray

SUBJECT: TURKEY POINT 3 & 4 AMENDMENTS ON REMOVING POWER FROM VALVES

OELD has been asked to concur in the issuance of Turkey Point license amendments requiring the removal of power from certain valves in order to avoid single failure problems. From reviewing the attached package, I note one problem which does not seem to have been resolved in the SER.

Specifically, the SER indicates that the absence of a positive valve position indication in the control room itself represents a potential single-failure problem. The SER further indicates that control room valve position indication will be required and that licensee is preparing a plant modification to provide for such indication. The problem is that, from the face of the SER, it appears that we would be issuing this amendment, requiring the removal of power from the valves, without any mechanism for control room valve position indication in place. (There is no statement that the licensee's plant modifications to provide control room valve position indication have been accomplished, even though licensee committed, in February 1983, to make the modifications). In effect, we would be eliminating one single failure problem by introducing another single failure problem. It seems to me that the valve position indication problem should be addressed in the SER. If licensee's control room indicators are installed and operable, that should be stated. If they are not installed and operable, then the SER must address why it is safe to remove power from the valves in question without having any valve position indication in the control room. In its present state, the SER raises the problem of lack of valve position indication but leaves it unresolved. As such, the ultimate finding that there is reasonable assurance of safety with the proposed amendment is not adequately supported.

Because of the valve position indication problem, I am not prepared to concur in the issuance of this amendment now.

  
J.R. Gray

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