Docket Files

FPL
FLORIDA POWER & LIGHT COMPANY

October 1, 1984
L-84-269

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 Reports 84-22/23

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,

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

JWW/PLP/js

Attachment

cc: Harold F. Reis, Esquire
PNS-LI-84-338

ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket No. 50-250, 50-251
IE Inspection Report 250-84-22 and 251-84-23

FINDING 1:

Technical Specification (TS) 1.4 states that a component is operable when it is capable of performing its intended function. TS 3.6 requires that charging pumps be operable during certain reactor conditions.

Contrary to the above, on July 3, 1984, during Unit 3 power operation, the "3A" charging pump was not capable of performing its intended function and the pump was not declared inoperable because the licensee had no operability criteria for the pumps.

RESPONSE:

1) FPL concurs with the finding.

2) The reason for the finding was that no specific testing and acceptance criteria for demonstrating the operability of the charging pumps or boric acid transfer pumps existed. Since no criteria was defined, no specific surveillance testing was performed.

3) Interim test and acceptance criteria for both the charging pumps and the boric acid transfer pumps has been developed. The charging pumps on both units were tested against the interim criteria and only one pump out of six did not pass the test. The pump that did not pass the test was repaired and retested satisfactorily. The boric acid transfer pumps for both units were tested against the interim criteria and all four pumps passed the test. The charging pumps and the boric acid transfer pumps will be tested against the interim criteria every three months beginning from the first tests and following maintenance affecting their performance. This interim criteria will be used to ensure pumps operability until permanent criteria is developed.

   A preliminary review of Technical Specifications Section 3 (LCOs), except for instrumentation, is being conducted to identify any other equipment that has a limiting condition for operation but no surveillance requirements. In addition, a review was conducted to develop a list of instruments in safety related systems that are not presently included in our calibration program. Documents used for this review were: procedures, operator logs and safety related operating diagrams.

4) a. Permanent testing procedures are being developed for the charging pumps and boric acid transfer pumps.

   b. The scope of the review has been expanded to include:

1. Review of the Technical Specifications against the FSAR to verify operability requirements of systems and related components.

2. Review the FSAR to verify adequate surveillance testing and operation of systems to ensure compliance with FSAR requirements.

The results of this review will be used to develop interim testing and acceptance criteria.

c. It is our intention to develop a permanent test and acceptance criteria to replace the interim. This development depends on the results of our reviews described in 4.b.

d. The charging pumps and boric acid transfer pumps will also be added to the IST program and tested accordingly starting 6 months following our submittal of the revised IST program.

5) Full compliance for item 4. a will be achieved by November 1, 1984. Full compliance for item 4. b, the system review, will be completed by December 1, 1984 and all immediate corrective actions will be initiated for any deficiencies discovered.

For item 4.c we expect to submit schedules and scope by December 1, 1984.

FINDING 2:

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 Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USNRC Regulatory Guide 1.33.

Section 5.3.5.(2) of ANSI N18.7-1972, "Performing of Maintenance", states that procedures should contain enough detail to permit the maintenance work to be performed safely and expeditiously. Contrary to the above:

FINDING 2.a:

On June 19, 1984, Maintenance Procedure (MP) 4107.7 "High Head SIS Pump Disassembly, Replacement of Rotating Element and Resassembly", failed to meet the requirements of TS 6.8.1 in that:

(1) MP-4107.7 did not contain sufficient detail to prevent the thrust bearings from being installed improperly.

(2) MP-4107.7 contained two superseded pages itemizing tolerance data which was not accurate and consequently, use of the procedure could have prevented the safe and expeditious repair of the pump.

(3) MP-4107.7 did not require the pump be refilled with oil.

(4) MP-4107.7 did not contain sufficient detail to require venting of the pump prior to operation.

RESPONSE:

1) FPL concurs with the finding.

2) Pre-review of the work package and tail board did not identify the two superseded pages. Also the procedure did not contain adequate details on other steps of the procedure.

3) MP-4107.7 was corrected with an On-The-Spot Change (OTSC). This procedure has been revised to include additional steps and to correct certain inadequacies.

4) Quality Control and Mechanical Maintenance Departments will pre-review the procedures to be used before starting a job.

5) Full compliance w ll be achieved by October 5, 1984.

FINDING 2.b:

Administrative Procedure (AP) 0190.10, "Cleaning of Nuclear Safety Related Systems and Components" was not properly implemented on June 19, 1984. The procedure states that all openings in nuclear safety related systems or components shall be protected from outside contaminants except when necessary to carry out required operations. During the performance of MP 4107.7 "High Head SIS Pump Disassembly, Replacement of Rotating Element and Reassembly", numerous pieces of component cooling water pipe were disassembled and left with pipe ends open to the environment and not protected against foreign material intrusion.

RESPONSE:

1) FPL concurs with the finding.

2) The mechanics did not cover the piping in question due to unawareness of the requirements to do so.

3) All plant work orders for safety-related equipment are being more closely scrutinized and instructions are being added on the subject of covering openings in safety-related systems. Maintenance Procedure 4107.7 has been revised to specify covering of openings in interconnecting system piping.

4) Quality Control has increased surveillances in the areas where the opening of safety-related systems are required by repairs. Reviews of maintenance procedures are to be performed in conjunction with the Procedure Upgrade Program to ensure the requirements of Administrative Procedure 0190.10 are incorporated where applicable.

5) Full compliance will be achieved by October 5, 1984.

FINDING 2.c:

Administrative Procedure (AP) 0103.11, "Housekeeping" was not properly implemented on June 19, 1984. The procedure establishes guidelines for the control of work activities, equipment, material and environments which affect the cleanliness of the plant site. It provides procedures for inspection and subsequent correction of unsatisfactory cleanliness conditions. Section 5.2 of AP 0103.11 requires that supervisors ensure and verify that areas under their cognizance are maintained in a clean condition and directs supervisors to ensure corrective actions are initiated to resolve unsatisfactory conditions. Section 8.5.1 of AP 0103.11 requires that following the completion of a work activity, or at the end of each work shift, whichever is sooner, all waste, debris, scraps and rags resulting from the activity shall be removed and equipment used shall be properly stored.

As of June 18, 1984, Section 5.2 of AP 0103.11 had not been properly implemented in that a supervisor failed to initiate any corrective action after discovering unsatisfactory cleanliness conditions in the Unit 4 Residual Heat Removal Pump Room. In addition, on or before June 18, 1984, Section 8.5.1 of AP 0103.11 was not implemented in that waste and debris, generated during a previous work activity in the Residual Heat Removal Pumps rooms for Unit 3 and Unit 4, were not removed following completion of the work activity. Equipment used during the activity was not properly stored upon completion of the activity.

RESPONSE:

1) FPL concurs with the finding.

2) Personnel involved failed to properly cleanup the work area after replacing insulation in Unit 4 Residual Heat Removal (RHR) pump rooms.

3) The Unit 4 RHR pump rooms were cleaned up to satisfactory standards.

4) The Plant Manager - Nuclear has instructed each Department Head to review Administrative Procedure (AP) 0103.11 for items of responsibility and discuss with their personnel the need to ensure that work areas are properly cleaned and equipment used is properly stored upon completion of a job.

5) Full compliance was achieved on June 22, 1984.

FINDING 3:

10CFR50, Appendix B, Criterion X as implemented by Florida Power and Light Topical Quality Assurance Report Rev. 6; TQR 10.0 "Inspection"; Quality Procedure 10.3 Rev. 5 "Inspection and Surveillance of Maintenance Activities Operations and Fuel Handling" and AP 0190.19, "Control of Maintenance on Nuclear Safety Related and Fire Protection Systems", requires in AP 0190.19 Appendix "A" that Quality Control (QC) holdpoints shall be included in maintenance procedures so that QC inspectors can witness and verify critical measurements and adjustments on Nuclear Safety Related systems and components in circumstances where such adjustments or measure cannot be verified subsequent to completion of the repair.

Contrary to the above, QC holdpoints for several procedural steps which deal with critical measurements and adjustments were not established in MP 4107.7, "High Head SIS Pump Disassembly, Replacements of Rotating Element and Reassembly".

RESPONSE:

1) FPL concurs with the finding.

2) The adequacy of QC holdpoints per AP 0190.19 App. A was assumed to be satisfactory since MP 4107.7 had been successfully utilized several times in the past. The procedure was not throughly reviewed for this reason.

3) Closer scrutinization of plant work orders and procedures has been implemented using better defined criteria for holdpoints. Maintenance Procedure 4107.7 has been revised to include more QC holdpoints for procedural steps which deal with critical measurements and adjustments.

4) AP 0190.19, Appendix A is being reviewed and revised to include provisions to further define the criteria for establishing holdpoints in procedures. Reviews of Maintenance Procedures are to be performed in conjunction with the Procedure Upgrade Program to insure requirements to AP 0190.19 are incorporated where applicable.

5) Full compliance will be achieved by October 5, 1984.

FINDING 4:

Technical Specification (TS) 4.1 specifies equipment and sampling that shall be conducted as specified in Table 4.1-2. Item 1.(h).(2) of Table 4.1-2 specifies that an isotopic analysis for Iodine sample shall be obtained between 2 and 6 hours following a thermal power change exceeding 15 percent of the rated power within a one hour period.

Contrary to the above, on May 13, 1984, an isotopic analysis for Iodine sample was not obtained between 2 and 6 hours following a thermal power change exceeding 15 percent of the rated power within a one hour period.

RESPONSE:

1) FPL concurs with the finding. This finding and corrective actions were addressed in LER 250-84-016 dated June 12, 1984.

2) A Chemistry Technician did not follow a pre-arranged sampling schedule and got a sample earlier than scheduled as a result.

3) Nuclear Chemistry Procedure 65 (NC-65), Determination of Radioactive DOSE EQUIVALENT I-131 in the Reactor Coolant System, has been revised to require the permission of the Chemistry Supervisor to discontinue DEQ I-131 sampling. Nuclear Chemistry Procedure 2 (NC-2), Schedule of Periodic Tests, has been revised to require Chemistry Technicians to contact the control room every 4 hours to determine unit status.

4) All Chemistry Technicians have been retrained in the use of Nuclear Chemistry Procedure 65. This training included an emphasis on the need to obtain permission from the Chemistry Supervisor before changing any DEQ I-131 sampling schedule.

5) Full compliance was achieved on September 18, 1984.