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SUBJECT: Responds to NRC Bulletin 88-010, "Nonconforming Molded-Case Circuit Breakers."

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FPL

P.O. Box 14000, Juno Beach, FL 33408-0420

JUN 2 1 1990

L-90-147
10 CFR 50.54(f)

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket No. 50-250 and 50-251
NRC Bulletin No. 88-10
Nonconforming Molded-Case Circuit Breakers

NRC Bulletin No. 88-10, "Nonconforming Molded-Case Circuit Breakers," issued November 22, 1988, requested that licensees take actions to provide reasonable assurance that molded-case circuit breakers (CBs), including CBs used with motor controllers, purchased for use in safety-related applications without verifiable traceability to the CB manufacturers perform their safety functions.

By letter L-90-119, dated April 3, 1989, Florida Power & Light Company (FPL) submitted complete responses to Actions Requested 1.a., 1.b., 1.c., and 6., and to Reporting Requirement 1.a. of NRC Bulletin No. 88-10. An additional four breakers were reported in FPL letter L-89-394, dated November 7, 1989. The status of those four breakers was updated in FPL Letter L-89-438, dated December 7, 1989. The purpose of this submittal is to provide FPL's response to items 2, 3, 4, 5, and 7 of the actions requested, and to Reporting Requirements 1.b., 1.c., and 2. This completes FPL's response to NRC Bulletin 88-10.

Should there be any questions about this information, please contact us.

Very truly yours,

K. N. Harris
Vice President
Turkey Point Plant Nuclear

KNH/DPS/dps

enclosure

cc: Stewart D. Ebneter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

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ATTACHMENT

NRC BULLETIN 88-10

Reporting Requirement:

1. All holders of operating licenses are required to provide a written report by April 1, 1989, that:

   b. Summarizes the total number, manufacturer, model number, and to the extent possible the procurement chain of those CBs that could not be traced to the CBM in items 1 and 4 of the actions requested. For installed CBs, also identify each system in which they are/were installed. If item 4 of the actions requested has not been completed by April 1, 1989, due to the schedule for tests in item 3 of the actions requested, this information should be updated within 30 days of the completion of item 4 to address those additional CBs that could not be traced to the CBM.

FPL Response

Florida Power & Light Company (FPL) provided a response to item 1 of the actions requested in letter L-89-119 dated April 3, 1989. For FPL's response to item 4 of the actions requested, refer to Reporting Requirement 1.c. below.

Reporting Requirement:

1.c. Confirms that items 1, 2, 3, 4, 5, 6, and 7 of the actions requested have been completed or will be implemented as requested.

FPL Response

FPL provided a response to items 1 and 6 of the actions requested in letter L-89-119, dated April 3, 1989.

Action Requested: 2. (item 2)

All holders of operating licenses who identify installed CBs per item 1 above or item 4 below that cannot be traced to a CBM are requested to prepare, within 30 days of the completion of each item, an analysis justifying continued operation until items 1 through 5 of the actions requested in this bulletin have been completed.

Following FPL's response to item 1 of the actions requested (L-89-119, dated April 3, 1989), an assessment of the acceptability of all installed safety related circuit breakers (CB) that were procured under the same purchase orders as the 48 nontraceable stored spare CBs was performed (Reference: NRC Bulletin 88-10, Supplement 1, Position 4). The results show five untraceable CBs installed in Turkey Point Unit 3 safety related systems. These CBs have been replaced with a traceable CBs in accordance with the criteria of item 7 of the actions requested. The information concerning these nontraceable breakers, as requested in item 4.c., is provided in Attachment 1 (item 1). Additionally, see FPL response to items 3, 4, and 5 of the actions requested for the remaining information requested in the subject item 2.

Action Requested: 3. (item 3)

All addressees who identify 80 percent or more CBs traceable to the CBM per item 1 above are requested to test the CBs that are not traceable to the CBM in accordance with the test program described in Attachment 1. Any installed CBs that fail any of the criteria of item 7 of the actions requested or CBs that pass all tests in accordance with the testing program described in Attachment 1, continue with item 4; otherwise, proceed to item 6 of the actions requested.

Holders of operating licenses are requested to complete this testing program before startup from the first refueling outage beginning after March 1, 1989. Holders of construction permits are requested to complete this testing program before fuel load.

FPL determined that 48 out of 237 CBs were maintained as stored spares which could not be traced to the original CB manufacturers (L-89-119, dated April 3, 1989). Therefore, FPL had determined that 80 percent or more of the stored spare CBs were traceable to the CBM. In a NRC memorandum from Charles E. Rossi to Steven A. Varga and Gary M. Holahan, "Interpretation/Clarification of Bulletin 88-10: Nonconforming Molded-Case Circuit Breakers," dated January 5, 1989, the NRC agreed that testing of the nontraceable spares need not be performed provided the utility performs Bulletin 88-10, items 4 and 5 of the actions requested, regardless of the traceability results of item 1 of the bulletin. Following a review of the Bulletin 88-10 CB test program, FPL elected not to test the 48 nontraceable CBs, and instead to perform items 4 and 5 of the actions requested in accordance with the January 5, 1989, NRC memorandum.

Action Requested: 4 (item 4)

All addresses who identify less than 80 percent of the CBs traceable to the CBM per item 1 above or who identify a failure rate of more than 10 percent for the CBs tested per action item 3 above are requested to perform the following actions:

a. Identify all molded-case CBs that have been purchased between August 1, 1983, and August 1, 1988, and installed in safety-related applications as replacements or installed during modifications.

b. Verify the traceability of these CBs.

c. Identify the number, manufacturer, model number, system in which they are/were installed and to the extent possible, the procurement chain for all those CBs identified in 4a that cannot be traced to the CBM.

FPL has conducted a search and has identified all molded-case CBs purchased for Turkey Point and installed in safety related applications. Traceability to the original CB manufacturer has been determined on all bout five (5) CBs which were not traced to the original CB manufacturer.

Action Requested: 5 (item 5)

All addressees who identify installed CBs that cannot be traced to the CBM per item 4 above are requested to replace these CBs with components that meet the criteria of item 7 of the actions requested or test them in accordance with the program described in Attachment 1; CBs that fail any of these tests should be replaced with CBs that meet the criteria of item 7 of the actions requested or CBs that pass all tests in accordance with the test program described in Attachment 1.

Holders of operating licenses are requested to replace or test at least one-half, or all if the total number is less than 75, of those installed CBs before startup from the first refueling outage beginning after March 1, 1989. The remaining CBs should be replaced or tested before startup from the second refueling outage beginning after March 1, 1989.

Holders of construction permits are requested to replace or to test these installed CBs before fuel load.

FPL Response

FPL has elected to replace those CBs listed in Attachment 1 with breakers that meet the criteria of item 7 of the actions requested. All five breakers have been replaced.

Action Requested: 7 (item 7)

With the exception of actions taken in response to items 3 and 5 of the actions requested above, molded-case CBs installed in safety-related applications after August 1, 1988 should be :

a. Manufactured by and procured from a CBM under a 10 CFR 50, Appendix B, program; or

b. Procured from a CBM or others with verifiable traceability to the CBM, in compliance with applicable industry standards, and upgraded to safety-related by the licensee or others using an acceptable dedication program. The NRC encourages addresses to significantly upgrade their dedication programs through a joint industry effort to ensure their adequacy and consistency. The NRC will monitor these industry initiatives and if they are not sufficient or not timely, or if problems with the dedication of commercial grade equipment for safety-related used continue, the NRC will take appropriate regulatory actions.

Molded case CBs to be installed in safety-related applications are manufactured and procured from a CB manufacturer under a 10 CFR 50, Appendix B program. Additionally, statements have been added to procurement documents for all molded case CBS requesting that certification of traceability to the breaker manufacturer be provided with the breakers.

Reporting Requirement:

2. All holders of operating licenses are required to submit a report that summarizes available results of tests conducted in accordance with items 3 and 5 of the actions requested within 30 days after startup from the first and second refueling outages beginning after March 1, 1989. For CBs that pass these tests, the only information required is the number, manufacturer, model number, and to the extent possible, the procurement chain of the CBs tested (summary report format is acceptable). For CBs that fail these test(s) these reports should indicate the test)s) and the values of test parameter(s) at which the failure occurred, as well as the corresponding manufacturer, model number, and to the extent possible, the procurement chain.

FPL Response

As stated in response to item 4 of the actions requested, FPL elected not to test the 48 nontraceable breakers, and instead elected to perform items 4 and 5 of the actions requested. Since FPL did not test, a report that summarizes the results of these test is not applicable.

ATTACHMENT 1

ITEM	MFR/SUPPLIER	PROCUREMENT CHAIN	MODEL/PART #	UNIT	SYSTEM	REPLACEMENT STATUS
1.	Gould	Unknown	HE3B030/30655	3	Inverter 3702A	Replaced
2.	Gould	Unknown	HE3B030/30755	3	Inverter 3707A	Replaced
3.	Telemecanique	Unknown	HE3B030/30759	3	Inverter 3701A	Replaced
4.	Brown Boverie	Unknown	HE3A025/30604	3	RHR-MOV-3-860B	Replaced
5.	Brown Boverie	Unknown	HE3A025/30678	3	PRMS(air & gas monitor 3)	Replaced

No molded-case circuit breakers needed to be replaced in Unit 4 to meet the guidelines of NRC Bulletin 88-10.