

APPENDIX B

NOTICE OF DEVIATION

Florida Power and Light Company
Turkey Point

License Nos. DPR-31
& DPR-41

Based on the results of the U.S. Nuclear Regulatory Commission inspection conducted on June 4-7, 1980 certain of your activities appear to deviate from your commitments to the Commission as indicated below:

Florida Power and Light (FP&L) Company's letter L-78-197 from R. E. Uhrig to A. Schwencer, NRR dated June 5, 1978 states in part that the NRC guidelines entitled "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls, and Quality Assurance" dated June 14, 1977, would be adhered to except as noted within Enclosure 1 to the June 5, 1978 letter.

Contrary to the above, the fire protection administrative control procedures do not meet the following NRC guidelines and no exception to these guidelines were identified in FP&L's letter of June 5, 1978:

1. Onsite plant procedures do not designate the onsite position responsible for the review and evaluation of proposed work activities to identify potential transient fire loads as required by Paragraph 1.d.(4) of Attachment 1 to NRC guidelines.
2. Existing procedures do not require a program to indoctrinate all plant contractor personnel in appropriate fire protection administrative procedures and emergency fire protection procedures as required by Paragraph 1.d.(5) of Attachment 1 to NRC guidelines.
3. Procedures do not address the review of transient fire loads resulting during maintenance and modification work activities and the need for additional fire protection equipment to be provided in the work area as required by Paragraph b of Attachment 3 to the NRC guidelines.
4. Procedures are not provided for the control of open flame and other possible ignition sources other than welding and cutting operations as required by Paragraph 1 of Attachment 4 to the NRC guidelines.
5. Procedures do not require the supervisor who approves welding and cutting permits to be trained in industrial fire fighting and fire prevention as required by Paragraph 2.a of Attachment 4 to the NRC guidelines.
6. Procedures do not require oxyacetylene equipment to be checked for leaks before being moved into the work area as required by paragraph 2.b.(4) of Attachment 4 to the NRC guidelines.

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