ENCLOSURE 1

NOTICE OF VIOLATION

Florida Power and Light Company
Turkey Point Units 3 and 4

Docket Nos. 50-250 and 50-251
License Nos. DPR-31 and DPR-41

The following violations were identified during an inspection conducted on April 8 - May 20, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. Technical Specification (TS) 6.8.1 requires that written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33.

   a. ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33 specify that maintenance which can affect the performance of safety-related equipment shall be performed in accordance with written procedures or documented instructions appropriate to the circumstances.

      Administrative Procedure (AP) 0190.10, dated May 18, 1984, Cleaning of Nuclear Safety-Related Systems and Components, section 8.1.1.5, requires that all openings in nuclear safety-related systems or components shall be protected from outside contaminants except when necessary to carry out required operations.

      Contrary to the above, AP 0190.10 was not implemented in that:

      (1) During the overhaul of the 3A residual heat removal pump, open flanges in the safety-related component cooling water supply to the pump were not protected from foreign material contaminants.

      (2) During the removal of the reactor vessel head closure studs, the stud insert holes were not protected from foreign material contaminants.

      Item 1.a.(1) above is a repeat of two previous violations: Violation 3.c of Inspection Reports 250/84-34 and 251/84-35; and Violation 2.b of Inspection Reports 250/84-22 and 251/84-23, Failure to Protect Safety-Related Components From Contaminants.

   b. Appendix A of Regulatory Guide 1.33 recommends that activities involving radiation protection and contamination control be covered by written procedures.

Health Physics Administrative (HPA) Procedure 0-HPA-002, dated December 14, 1982, Requirements for Entry and Work in RCA, section 5.2.15, requires that all personnel working in an area where a radiation work permit (RWP) is required shall read and comply with instructions, requirements and remarks listed on the RWP.

Contrary to the above, 0-HPA-002 was not implemented in that:

(1) On April 30, 1985, one individual, working in the Unit 3 spent fuel pool area, failed to comply with the protective clothing requirements of RWP 85-500 in that he did not wear a full hood while using a communications headset.

(2) On May 14, 1985, one individual entered the Unit 3 charging pump room and failed to comply with the protective clothing requirements of RWP 85-014 in that he did not wear gloves.

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

AP 103.11, dated April 17, 1985, Housekeeping, establishes guidelines for the control of work activities, equipment, material and environments which effect the cleanliness of the plant site. Section 8.5.1 of AP 103.11 requires that following the completion of a work activity or at the end of each shift, whichever is sooner, that all waste, debris, scraps and rags resulting from the activity shall be removed from the area. The equipment used shall be removed from the area or properly stored.

Contrary to the above, on May 8, 1985, section 8.5.1 of AP 103.11 was not implemented, since an accumulation of waste and debris generated during work in the Units 3 and 4 cask wash areas and the Unit 3 new fuel storage area was not removed at the end of the work shift. Equipment used in the cask wash areas was not properly stored.

This item (1.c) is a repeat of Violation 2.c of Inspection Reports 250/84-22 and 251/84-23, Failure to Perform Adequate Housekeeping Activities.

These items together constitute a Severity Level IV violation (Supplement I).

2. 10 CFR 50, Appendix B, Criterion XIII, as implemented by FPL Topical Quality Assurance Report (FPL-NQA-100A) Revision 6, TQR 13.0, Handling, Storage and Shipping, requires, in part, that measures be established to control handling of equipment in accordance with work and inspection instructions to prevent damage or deterioration.

FPL Quality Assurance Manual, Quality Procedure (QP) 13.1, Revision 4, delineates requirements for the handling of materials, parts and components at the plant site and implements the requirements of 10 CFR 50, Appendix B, Criterion XIII and ANSI N45.2.2-1972, Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants.

QP 13.1, section 5.4.2, Inspection of Equipment, requires that prior to use, handling equipment shall be inspected for acceptability. The equipment shall not be used if it fails to meet manufacturer's specifications, if it is frayed or deteriorated or if it contains contaminants that would be detrimental to the material being handled.

Contrary to the above, the licensee failed to establish methods to control the handling of material in accordance with work and inspection instructions to prevent damage, as required by QP 13.1, TQR 13.0, ANSI N45.2.2-1972 and 10 CFR 50, Appendix B, Criterion XIII. Work instructions were not established to assure the proper handling of equipment, consequently:

a. On April 29, 1985, a nylon rope was knotted and fashioned into a sling and used to hoist hafnium burnable poison assemblies. The knotted rope did not meet the quality standards of ANSI N45.2.2-1972 in that the knot was not certified to meet any standards. Factory manufactured slings were available for use and were not used.

b. On April 29, 1985, an electric hoist in the Unit 3 new fuel storage room was used to lift hafnium burnable poison assemblies. The hoist contained contaminants in the form of grease which dripped on a poison assembly rendering the assembly temporarily unusable. The use of a hoist which could contaminate the safety-related material is contrary to ANSI N45.2.2-1972.

c. On May 9, 1985, nylon slings were used to hoist a section of safety-related pipe. One of the slings was frayed, worn and deteriorated which is contrary to ANSI N45.2.2-1972.

These items together constitute a Severity Level IV violation (Supplement I).

3. 10 CFR 50, Appendix B, Criterion XV, as implemented by FPL Topical Quality Assurance Report Revision 6, TQR 15.0, Nonconforming Materials, Parts or Components, QP 15.2, Control of Nonconforming Materials, Parts or Components in Operating Plants and AP 190.13, dated August 2, 1984, Corrective Action for Conditions Adverse to Quality, require that corrective action be initiated for conditions adverse to quality.

Contrary to the above, the licensee failed to review nonconforming items for their acceptance, rejection, repair, or rework in accordance with documented procedures as required by 10 CFR 50, Appendix B, Criterion XV, TQR 15.0, QP 15.2 and AP 190.13. On April 29, 1985, during a receipt inspection of

hafnium burnable poison inserts, a Quality Control Inspector observed a condition adverse to quality in that grease was observed on one insert, and corrective action in accordance with approved plant procedures was not implemented. The insert was not rejected and was not segregated from noncontaminated inserts. The cleaning of the insert was not documented. The reinspection of the insert was not documented. These discrepancies are contrary to AP 190.13.

This is a Severity Level IV violation (Supplement I).

4. 10 CFR 50, Appendix B, Criterion VII, as implemented by FPL Topical Quality Assurance Report Revision 6, TQR 7.0, Control of Purchased Items and Services, requires that measures shall be established to assure that purchased material conforms to the requirements of applicable procurement documents. To this end, the FPL Quality Assurance Program incorporates the requirements of ANSI N45.2.2-1972, Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants. QP 7.1 specifies that receipt inspections of nuclear fuel will be performed in accordance with site-specific procedures. Operating Procedure (OP) 16009.11, dated April 26, 1985, On Site Unpacking, Inspection, and Manual Loading of Hafnium Vessel Flux Depression Assemblies, specifies the minimum receipt inspection criteria for the hafnium poison inserts and implements the above criteria.

   Contrary to the above, the licensee failed to include, in the established measures, provisions for examination of products on delivery, as required by 10 CFR 50, Appendix B, Criterion VII, TQR 7.0, QP 7.1 and ANSI N45.2.2-1972. Specifically, on April 29, 1985, during the receipt inspection of some of the hafnium poison inserts, OP 16009.11 did not address the following areas:

   a. Specific criteria were not established with which to determine that damage had not occurred to the inserts and that the inserts were sufficiently clean as required by ANSI N45.2.2-1972.

   b. The inspection procedure did not specify that the preliminary visual inspection determine if damage had been sustained due to fire, exposure, rough handling or tie down failure as required by ANSI N45.2.2-1972.

   This is a Severity Level IV violation (Supplement I).

5. TS 6.8.1 requires that written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33.

   ANSI N18.7-1972, section 5.1.6.3, Scheduling of Maintenance, requires that maintenance be scheduled and planned so as not to jeopardize the safety of the reactor. Planning shall consider the possible safety consequences of concurrent or sequential maintenance, testing or operating activities. Equipment required to be operable for the mode in which the reactor exists

shall be available, and maintenance shall be performed in a manner such that the license limits are not violated.

Contrary to the above, as of April 25, 1985, written procedures and policies were not established to implement the requirements of ANSI N18.7-1972, section 5.1, in that the "A" train emergency diesel generator was taken out-of-service for preventive maintenance at a time when its operation was required to support the reactor operating mode. Concurrent maintenance on the 3B 4160 Volt vital bus was not considered in planning the maintenance activity. Consequently, only one of two safety injection pumps, assumed to be operable in the safety analysis report and required for operation by the Technical Specifications, had both its normal and emergency power supplies.

This is a Severity Level IV violation (Supplement I).

6. 10 CFR 50.55a.(g) requires ASME Code Testing for Class 3 components. ASME Code, Section XI (1974 Edition), article IWD-1000 applies the requirements of Section IWD to Class 3 pressure-retaining components. IWD-2000 requires inspection of the components each inspection interval. IWD-2600 requires the visual examination to be conducted of the components during system tests for evidence of structural distress or corrosion.

Contrary to the above, during the system inservice testing for the Class 3 Intake Cooling Water (ICW) system on Unit 3 in December 1983 and on Unit 4 in May 1984, visual inspections for evidence of structural distress or corrosion were not conducted for piping and bolted connections which were located between the ICW pump discharge check valves and the header isolation valves.

This is a Severity Level IV violation (Supplement I).

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice a written statement or explanation in reply including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: JUL 10 1985