

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 June 10 - July 8, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. Technical Specification (TS) 3.5, Instrumentation, delineates the conditions of the instrumentation and safety circuits necessary to ensure reactor safety. Table 3.5-2, Engineered Safety Features Actuation, Item number 1.5, requires the high steam flow in two of three steam lines with the low average temperature safety injection (SI) circuit to be operational when the reactor is not in cold shutdown. Note 2 of Table 3.5-2 states that this safety injection signal may be manually bypassed when cooling down the reactor and the average temperature is below 543 degrees F.

Contrary to the above, on May 30, 1985, following a Unit 4 reactor trip, the high steam flow in two of three steam lines with low average temperature safety injection circuit was intentionally made unavailable by use of the SI block switch. The SI signal was manually blocked when average coolant temperature was above 543 degrees F. No reactor cooldown was in progress. The safety circuit remained blocked for approximately one hour.

This is a Severity Level IV violation (Supplement I). This violation applies to Unit 4 only.

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

Appendix A of USNRC Regulatory Guide 1.33, Section 8, Item (1)K, recommends that surveillance procedures be written covering control rod operability and scram time tests. Operating Procedure (OP) 1604.8, dated April 16, 1984, entitled CRDM/RPI Stepping and Drop Time Test, provides instructions for performing the rod control cluster stepping test, the rod drop time test and the rod position indication system calibration. Figure 1 of OP 1604.8 identifies the proper way to perform the rod drop time measurements.

Contrary to the above, on June 25, 1985, OP 1604.8 was not properly implemented, in that rod drop time measurements for shutdown bank A were calculated in a manner contrary to that identified in Figure 1 of the procedure. This resulted in the recording of erroneous rod drop travel times for shutdown bank A.

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This is a Severity Level IV violation (Supplement I). This violation applies to Unit 3 only.

3. TS 4.1, Operational Safety Review, requires that equipment and sampling tests shall be conducted as specified in Table 4.1-2. Item 10 of Table 4.1-2 requires that accumulator boron concentration be sampled prior to heatup above 200 degrees F.

Contrary to the above, on June 22, 1985, the Unit 3 primary coolant system was heated above 200 degrees F without prior performance of the accumulator boron concentration analysis.

This is a Severity Level IV violation (Supplement I). This violation applies to Unit 3 only.

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 30 1985

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