

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 July 8 - August 19, 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. Operations Surveillance Procedure (OSP) 3-OSP-075.1, dated June 12, 1985, entitled Auxiliary Feedwater Train 1 Operability Verification, provides instructions for securing the A and C auxiliary feedwater (AFW) pumps following operation. Sections 7.1 and 7.2 of 3-OSP-075.1 specify that the trip-and-throttle valves for the pumps are to be open prior to exercising the governor oil knob.

Contrary to the above, on July 22, 1985, the A and C AFW pump governor oil knobs were exercised prior to opening the trip-and-throttle valve for each pump. Subsequently, when the trip-and-throttle valves were opened, each governor became misadjusted due to additional pump rotation. Consequently, the A and C AFW pumps tripped on mechanical overspeed when next called upon to operate.

- b. Administrative Procedure (AP) 0190.19, dated May 21, 1985, entitled Control of Maintenance on Nuclear Safety Related and Fire Protection Equipment, requires that a plant work order (PWO) be issued for maintenance activities. Section 8 of the procedure requires that quality control and supervisory reviews be performed prior to beginning the maintenance and that the activities be thoroughly documented on the PWO.

Contrary to the above, on July 14, 1985, maintenance was performed on Unit 3 AFW flow control valve CV-3-2833 and a PWO was not issued for the activity. Quality control and supervisory reviews of the maintenance were not performed and the maintenance was not documented.

- c. AP 0190.19, dated May 21, 1985, entitled Control of Maintenance on Nuclear Safety Related and Fire Protection Equipment, requires, in section 8, that the conduct of maintenance activities be thoroughly documented on a PWO.

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Contrary to the above, on July 30, 1985, maintenance activities were not thoroughly documented during the replacement of switch S-5 in reactor protection system rack 41 of Unit 3, in that erroneous and incomplete information was recorded on PWO 7546. The PWO documentation section did not indicate that wiring changes were made on the switch prior to its final installation.

- d. Section 5.1 of ANSI N18.7-1972 and section 9 of Appendix A of USNRC Regulatory Guide 1.33 require that maintenance that can affect the performance of safety-related equipment shall be properly planned and performed in accordance with written procedures, documented instructions or drawings appropriate to the circumstances.

Contrary to the above, maintenance procedures for the 3A and 3B feedwater regulating valve flow controllers (CV-2900 and CV-2901, respectively) were not adequately implemented in that the controllers were wired to power supplies other than those specified in the approved drawings. The controllers had received maintenance on an unspecified previous occasion. The discrepancy was identified on August 1 and corrected on August 2, 1985.

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

2. TS 6.8.3 requires that temporary changes to procedures only be made provided that:
- a. The intent of the original procedure is not altered;
 - b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operator's License on the unit affected; and
 - c. The change is documented, reviewed by the Plant Nuclear Safety Committee (PNSC) and approved by the Plant Manager-Nuclear within 14 days of implementation.

Contrary to the above, on July 22, 1985, temporary changes were made to procedure 3-OSP-075.1, dated May 12, 1985, entitled Auxiliary Feedwater Train 1 Operability Verification, and procedure 3-OSP-075.2, dated May 12, 1985, entitled Auxiliary Feedwater Train 2 Operability Verification, in that numerous procedural steps were not performed. The omissions included not recording pump discharge pressure, not observing pump operation to check for noise or vibration, not running each pump for the required 15 minute interval, and not verifying that each pump delivered 375 gallons per minute to the steam generators within three minutes of initial operation. The omissions constituted changes to the intent of the procedures in that the acceptance criteria for pump operability were modified to be less restrictive than was previously acceptable. The changes, consisting of intentionally omitted procedural steps, were not approved by two members of the plant management staff. The changes were not documented, reviewed by the PNSC or approved by the Plant Manager-Nuclear within 14 days.

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

- 10 CFR 50, Appendix B, Criterion XVI, as implemented by FPL Topical Quality Assurance Report (FPL-NQA-100A) Revision 7, TQR 16.0, Corrective Action, requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

FPL Quality Assurance Manual, Quality Procedure (QP) 16.1, Revision 8, delineates requirements for assuring that conditions adverse to quality are corrected.

AP 0190.13, dated May 21, 1985, entitled Corrective Action for Conditions Adverse to Quality, itemizes the mechanisms by which conditions adverse to quality are promptly identified, tracked and corrected.

Contrary to the above, the licensee failed to establish measures to assure that conditions adverse to quality were promptly identified and corrected, in that the licensee's corrective action program was implemented in a manner which allowed symptom correction without requiring the identification, evaluation and correction of the source problem. Consequently, on July 14 and again on July 22, water was drained from the instrument air supply line for AFW flow control valve CV-3-2833 to restore valve operability, and no effort was made to locate, evaluate or correct the source of the water. Failure to prevent water from entering the instrument air system resulted in an additional malfunction of CV-3-2833 on July 24, 1985. The licensee did not address the degraded status of the instrument air dryers and heaters until 10 days after the air system was known to contain water. By that time AFW flow control valve CV-3-2833 had failed on three separate occasions.

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: SEP 05 1985

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