

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 August 20 - October 15, 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. Operating Procedure (OP) 3204.1, dated December 20, 1984, entitled Residual Heat Removal Periodic Test, requires, in section 8.8.4, that a second person independently verify that four breakers are locked open.

Contrary to the above, on September 5, 1985, section 8.8.4 of OP 3204.1 was not implemented, in that the required independent verification was not performed prior to running the Unit 4A residual heat removal pump.

- b. OP 4-OP-013, dated August 28, 1985, entitled Instrument Air System, requires, in section 6.1, that Unit 4 instrument air be routed through the Unit 3 instrument air system dryers when the Unit 4 instrument air dryers are taken out of service.

Contrary to the above, on September 20, 1985, section 6.1 of 4-OP-013 was not implemented, in that the Unit 4 instrument air dryers were taken out of service without routing the Unit 4 instrument air through the Unit 3 instrument air system dryers.

- c. Administrative Procedure (AP) 0-ADM-503, dated July 10, 1985, entitled Control and Use of Temporary System Alterations, requires, in section 3.6.2, the performance of quarterly reviews of temporary system alterations (TSA). Section 5.5.3 of AP 0-ADM-503 requires that the TSA log tracking sheets be updated following the implementation of a TSA. Section 5.6.1 of AP 0-ADM-503 requires that the Plant Nuclear Safety Committee review TSA's within 14 days of the performance date.

Contrary to the above, prior to October 3, 1985, AP 0-ADM-503 sections 3.6.2, 5.5.3, and 5.6.1 were not implemented, in that the procedural requirements of each section were not met.

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

8511190277 851112  
PDR ADOCK 05000250  
Q PDR



1952

2. TS 6.5.1.6.d requires that the Plant Nuclear Safety Committee (PNSC) review all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

Contrary to the above, prior to October 3, 1985, numerous TSAs, constituting temporary nuclear safety related equipment changes or system modifications, were not reviewed by the PNSC until after they were installed in the plant.

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

3. 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 June 23, 1985, the B auxiliary feedwater (AFW) pump failed its operability test, tripping twice on electronic overspeed, and maintenance repairs resulted in symptom correction rather than root cause identification and repair. As a result, the B AFW pump again tripped on electronic overspeed on July 22, 1985. Subsequent testing revealed that the electronic overspeed trip occurred prior to the required setpoint. The licensee did not fully address the reason for the June 23 overspeed trips until the problem recurred in July.

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

4. TS 3.3.3, requires, in part, that containment isolation valves for phase A containment isolation be operable and that automatic valves be capable of closing within the time frames specified in section XI of the ASME Boiler and Pressure Vessel code and applicable Addenda as required by 10 CFR 50.55 a.(g).

Contrary to the above, between June 26 and August 8, 1985, Unit 4C steam generator blowdown isolation valve CV-4-6275C was not operable, in that it was not capable of automatic closure as specified in section 6.6 of the Final Safety Analysis Report. An inappropriate TSA resulted in the inability of the valve to close on a phase A containment isolation signal.

Florida Power and Light Company  
Turkey Point Units 3 and 4

3

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

This is a Severity Level IV violation (Supplement I) and applies to Unit 4 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: NOV 12 1985

