

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 violation was identified during an inspection conducted on December 9, 1985 - January 13, 1986. The Severity Level was 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. Appendix A of USNRC Regulatory Guide 1.33 recommends that written procedures be established covering the startup, operation and shutdown of the emergency core cooling system (ECCS). The cold leg accumulators constitute a portion of the emergency core cooling system.

The Final Safety Analysis Report (FSAR) does not consider the consequences of a loss of coolant accident (LOCA) when the cold leg accumulators are unavailable.

Operating Procedure (OP) 0202.1, Reactor Startup - Cold Condition to Hot Standby Condition, recommends, but does not require, that the cold leg accumulators be placed in service prior to exceeding 1000 pounds per square inch (psi) reactor coolant system pressure.

Contrary to the above, OP 0202.1 was not adequate, in that it allowed the units to be operated at full temperature and pressure without the cold leg accumulators in service, that is, to be operated in an unanalyzed configuration without regard for the possibility that an accident of a different type than any previously identified in the FSAR could occur.

Between June 23 and 26, 1985, the Unit 3 reactor was operated at full temperature and pressure (hot standby condition) while all three accumulators were empty and depressurized. On several additional occasions, the licensee has failed to maintain the required level and pressure in the accumulators while the units were in hot standby.

- b. ANSI N18.7-1972, section 5.3.(3), Post-Maintenance Checkout and Return to Service, requires that instructions shall be included in maintenance procedures for returning equipment to its normal operating status. It further states that operations personnel shall place the equipment in service and verify and document its functional acceptability. Special

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attention shall be given to restoration of normal conditions, such as removal of signals used in maintenance or testing, and to systems that can be defeated by leaving valves or breakers mispositioned.

Contrary to the above, during the performance of maintenance repairs on the "B" emergency diesel generator (EDG) day tank level switch (LS 1561B), using maintenance work orders 63-8224 and 69-4437, instructions were not included or referenced in the work orders regarding restoration of valves to their normal positions. Consequently, on December 10, 1985, two level switches, located adjacent to the work area, were not returned to service because their isolation valves were inadvertently left shut. This disabled both the remote day tank low level alarm and the automatic start capability of the "B" fuel oil transfer pump.

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 violation, (2) the reasons for the violation 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.

FEB 21 1986

Date: \_\_\_\_\_