

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 February 10 - March 10, 1986. The Severity Level was assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

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 states that written procedures should be established for the shutdown cooling system and the emergency core cooling system.

The intake cooling water (ICW) system is an essential subsystem of the shutdown cooling system and the emergency core cooling system.

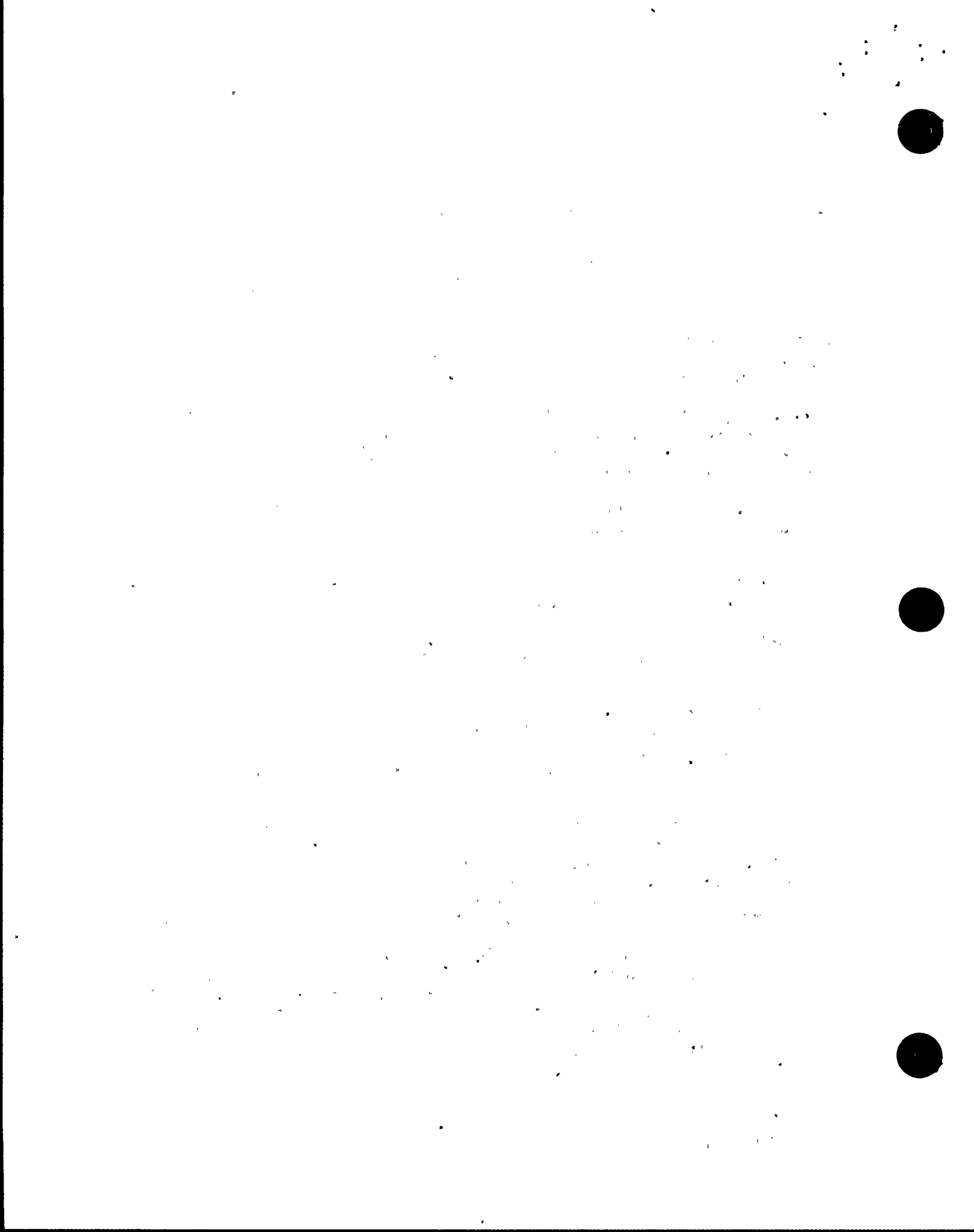
Operating Procedure 3400.1, Intake Cooling Water System - Normal Operation, provides instructions for ICW system operation and alignment.

Florida Power and Light (FPL) inter-office correspondence PTN-TECH-85-754, ICW Pump Discharge Check Valves, dated November 7, 1985, states that instrument air to the ICW system pump discharge check valve closing cylinders is necessary for continued operation of the ICW system.

FPL inter-office correspondence JPE-PTPM-85-1409, dated December 16, 1985, postulates that the check valve air closing cylinders enhance valve operation by overcoming minor rust/friction binding to reduce check valve slam. The document states that air closing cylinders are not considered essential to ICW system operability provided that operation without instrument air available is kept negligibly short.

Contrary to the above, as of March 10, 1986, Operating Procedure 3400.1, dated August 7, 1985, was inadequate, in that it failed to provide any guidance in the form of requirements and limitations for the operation of the Units 3 and 4 ICW pump discharge check valves (3/4-311, 321, 331) with respect to the availability of instrument air to the check valve closing cylinders.

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- b. Section 5.1 of ANSI N18.7-1972 requires that written administrative policies shall be provided to control the issuance of documents, including changes, that prescribe activities affecting safety-related structures, systems, or components, such as operating procedures, test procedures, equipment control procedures, and refueling procedures. These policies shall assure that documents, including revisions or changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used by the personnel performing the prescribed activity.

Turkey Point Units 3 and 4 Administrative Procedure (AP) 0140.2, Changing Setpoints, dated April 13, 1984, states that the Instrumentation and Control Department is responsible for updating the Precautions, Limitations and Setpoints (PLS) Document and ensuring that Document Control is notified of the approved setpoint modification so that the controlled copies of the PLS Document can be updated.

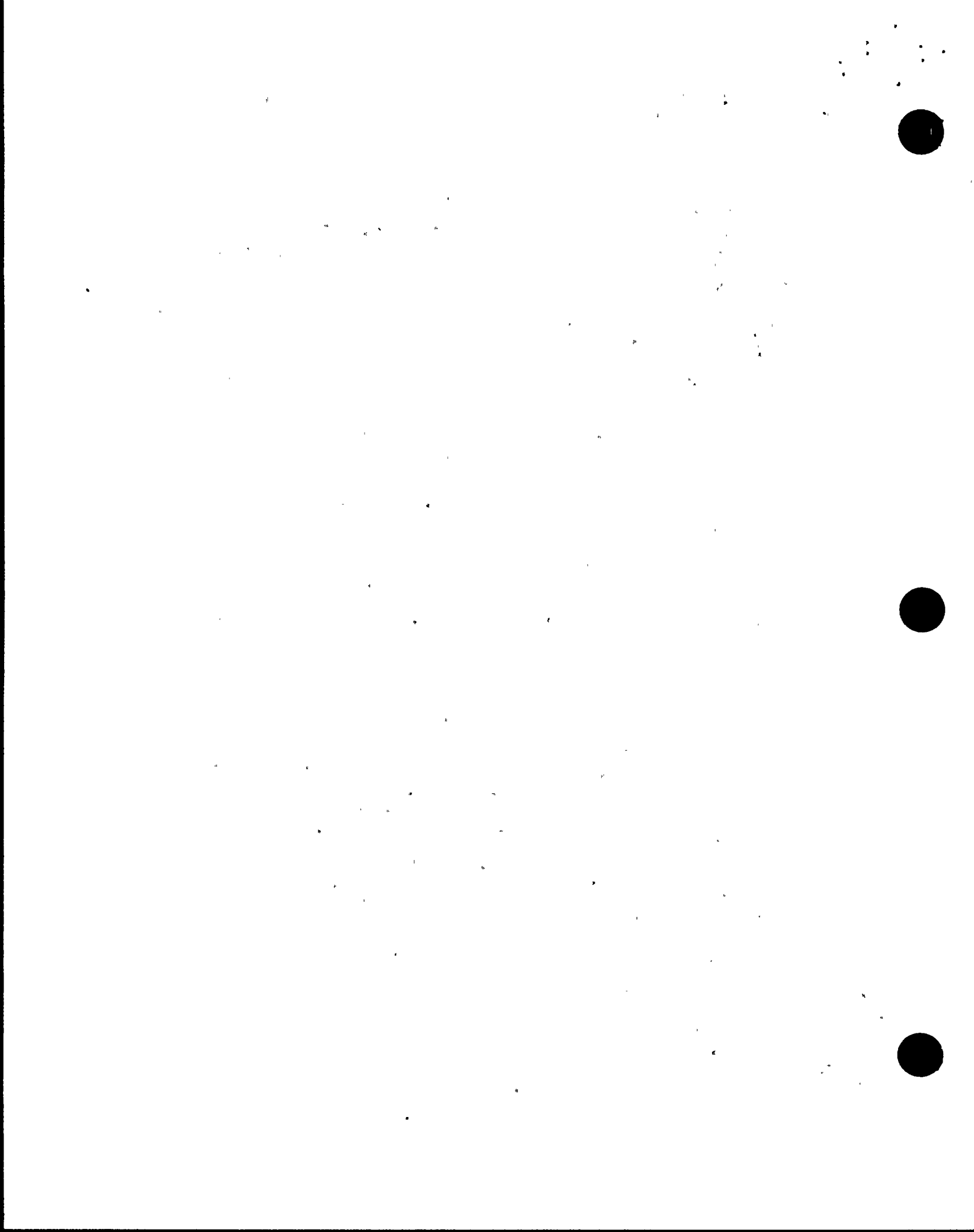
Contrary to the above, in December 1984, AP 0140.2 was not properly implemented in that the Unit 3 turbine governor runback motor was replaced with a slower speed motor and the associated time delay relay setpoint was increased from 9 to 11.5 seconds, but the PLS Document was never updated to reflect the modified setpoint.

- c. Section 5.1.6.1 of ANSI N18.7-1972 requires that maintenance which can affect the performance of safety-related equipment shall be properly preplanned and performed in accordance with written procedures, documented instructions or drawings appropriate to the circumstances.

Contrary to the above, on February 11, 1986, maintenance troubleshooting was performed which was not properly preplanned and relied upon a procedure which was not appropriate to the circumstances, in that Off-Normal Operating Procedure 9608.1, dated October 16, 1985, entitled 125 Volt DC System - Location Of Grounds, was used for a purpose other than that for which it was intended. Consequently, Operations personnel inadvertently initiated a reactor trip by implementing a procedural step, normally acceptable during ground isolation proceedings, solely to identify the source of a fuse failure in the reactor protection system. The step was inappropriate to the circumstances because no 125 volt DC ground existed and a reactor protection system fault existed which invalidated the procedure guidance.

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.



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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: APR 16 1986

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