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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251  
 AUTH. NAME AUTHORITY AFFILIATION  
 WOODY, C. O. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds re violations noted in Insp Repts 50-250/87-22 & 50-251/87-22. Corrective actions: operator counseled & special instruction to provide addl guidance for performing evolution briefings issued.

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 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

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JULY 10 1987  
L-87-289  
10CFR 2.201

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inspection Report 87-22

Florida Power & Light has reviewed the subject inspection report and a response is attached.

There is no proprietary information in the report.

Very truly yours,

C. O. Woody  
Group Vice President  
Nuclear Energy

COW/SDF/gp

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

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ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4  
DOCKET NO. 50-250, 50-251  
IE INSPECTION REPORT 250-87-22 & 251-87-22

FINDING:

Technical Specification (TS) 6.8.1 requires that written procedures and administrative policies shall be established, implemented, and maintained that meet or exceed the requirements of sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33.

ANSI N18.7-1972, section 5.1.5, specifies that procedures shall be provided for control of equipment, as necessary, to maintain reactor and personnel safety and to avoid unauthorized operation of equipment. Section 5.1.2 of ANSI N18.7-1972 specifies that procedures shall be followed.

Administrative procedure (AP) 0103.4, entitled In-Plant Equipment Clearance Orders, revision dated March 10, 1987, specifies in section 5.4.1 that it is the responsibility of the clearance executor to follow the clearance tag-out and/or tag removal in the order given, he shall request clarification from the originator of the order before proceeding.

Contrary to the above, on May 7, 1987, while restoring from maintenance on the 3D 480 volt load center, clearance order release instructions were not executed in the order given on clearance 87-5-XI-131. As a result, a protection logic actuation stripped the 3B 4160 volt bus and the B emergency diesel generator (EDG) started and auto-connected to the 3B bus. Subsequent automatic loading of the 3D load center caused the B EDG to be connected without synchronization to offsite power through the 3A 4160 volt bus.

RESPONSE:

- 1) FPL concurs with the finding.
- 2) As described in Licensee Event Report (LER) 250-87-012, the cause of the event was personnel error in that the operator did not lift the equipment clearance prior to performing steps of a procedure for normal operation of the affected equipment. This resulted in the protection logic for the 3B 4160 volt bus sensing an undervoltage condition, initiating sequencer action and automatic starting of the B emergency diesel generator.
- 3)
  - a) The operator was counseled on procedural compliance and following verbal directions.
  - b) A special instruction was issued to provide additional guidance for performing evolution briefings. The instruction delineates the methods for evolution briefings so that these types of errors are minimized.

4) The Plant Training Department will evaluate this event for appropriate training requirements and methods.

5) a) Full compliance for item 3 above was achieved on May 14, 1987.

b) Full compliance for item 4 above will be achieved by August 28, 1987.