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Docket Nos. 50-250, 50-251
License Nos. DPR-31, DPR-41
EA 87-97

Florida Power and Light Company
ATTN: Mr. C. O. Woody
Group Vice President
Nuclear Energy Department
P. O. Box 14000
Juno Beach, FL 33408

Gentlemen:

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY
(NRC INSPECTION REPORT NOS. 50-250/87-14 AND 50-251/87-14;
AND NRC AUGMENTED INSPECTION TEAM REPORT NO 50-251/87-16)

This refers to the NRC inspection conducted March 9 through April 27, 1987, and the NRC Augmented Inspection Team (AIT) review of the Unit 4 Instrumentation Port Column leakage conducted March 19 through May 5, 1987, at the Turkey Point Nuclear Plant, Units 3 and 4, Homestead, Florida. Details of these inspections were provided to you by letters dated May 21, 1987 and May 15, 1987, respectively, and indicated significant NRC-identified failures to comply with NRC requirements. The violations associated with the above inspections were discussed at an enforcement conference held on June 5, 1987, at the Region II Office, Atlanta, Georgia.

Violation I.A described in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty addresses the failure to adequately evaluate and correct a reactor coolant leak from a Unit 4 instrument port column fitting that was identified during a licensee inspection conducted on August 30, 1986. FP&L management chose to authorize operation for a six-month period, based on an engineering safety evaluation which was hastily reviewed and subsequently determined to not have appropriately assessed the probable corrosive effects of boric acid residue on ferritic steel reactor components. This resulted in the substantial corrosion of some reactor vessel head closure components.

Further, on October 24, 1986, FP&L had an opportunity to repair the Conoseal fitting when the reactor was shut down for another reason. Your preliminary inspection showed that the reactor coolant leak remained and boric acid was accumulating on and around the vessel head area. However, the boric acid was cleaned up by maintenance personnel prior to an inspection by Engineering. This Engineering inspection failed to consider the potential for widespread effects of leakage in the head area beyond the readily accessible, visible areas. FP&L management continued to rely on the initial faulty safety evaluation and determination that the situation was acceptable for continued operations. Management decisions were made with lack of adequate information concerning the scope of the potential problem. The plant was allowed to start up in

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August 1986, and to restart in October 1986, even though information regarding the effects of boric acid leaks was documented in several previous NRC and INPO Notices.

While the actual corrosion damage found in April 1987 did not cause components to be operated beyond design conditions or limits, continued operation in this leakage environment could have posed an unwarranted degradation of an important barrier to the potential release of fission products to the environment. Therefore, this violation is considered significant because it illustrates the failure of licensee management and the operating staff to fully comprehend and deal with the adverse effects of plant operations in this mode.

Violation I.B in the enclosed Notice involves the failure to ensure that the required prerequisites and approvals were met prior to commencing core alteration activities. In this regard, activities commenced by maintenance personnel to remove the upper core support structure without (1) notifying the control room and establishing direct communications, (2) having the containment ventilation isolation system operable, and (3) being directly supervised by a licensed Senior Reactor Operator. Had the control room not responded properly to a radiation alarm in containment, the removal of the upper core support structure would have been completed. It is unlikely that fuel movement and damage would have occurred which released airborne activity. Nevertheless, we are concerned that these failures are indicative of a lack of appreciation for controls of licensed activity and communications by the Maintenance staff to assure other organizations are aware of maintenance activities. While the action by Operations personnel was commendable, those of the Maintenance staff were unacceptable.

To emphasize again the need for FP&L to improve the control of operations and the management decisionmaking process, including communications between major plant staffs at the Turkey Point Nuclear Plant, I have been authorized, after consultation with the Director, Office of Enforcement, and the Deputy Executive Director for Regional Operations, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty in the amount of One Hundred Thousand Dollars (\$100,000) for the violation described in the enclosed Notice. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", 10 CFR Part 2, Appendix C (1987) (Enforcement Policy), the violations described in the enclosed Notice have each been categorized in the aggregate as a Severity Level III problem. The base value of a civil penalty for a Severity Level III problem is \$50,000. The escalation and mitigation factors in the Enforcement Policy were considered. The base civil penalty amount has been increased by 100 percent because of the lack of prompt corrective action to the leakage situation which was compounded by the failure of FP&L management to utilize available information of prior occurrences relating to the effects of boron leakage at other facilities. There was also a lack of an effective management and safety committee review of the safety evaluation. Furthermore, escalation was warranted in consideration of the poor prior performance in the area of reactor operations and maintenance at Turkey Point as evidenced by the Category 3 ratings in the last two Systematic Assessment of Licensee Performance (SALP) Reports, and the number and scope of violations in these areas over the past two years.

The remaining violations in the enclosed Notice of Violation have been determined to be of a lesser safety significance and are categorized as Severity Level IV violations. These involved (a) the use of inadequate procedures for the installation of reactor vessel head Conoseal shims which existed from 1972 through 1985, and the improper fabrication of Conoseal shims during the 1984



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Unit 4 refueling outage, and (b) the inadequate procedure for calculation of reactor coolant system leakage due to use of a correction factor which was not conservative with respect to temperature rise.

During the Enforcement Conference, discussions also included activities relating to the failure to control wiring of diesel generator sequencers. On March 27, 1987, with Units 3 and 4 in Mode 6, licensee personnel were performing periodic testing to verify the operability and correct calibration of several of the "B" Emergency Diesel Generator (EDG) protection relays. During this testing, a wiring error was discovered and promptly corrected with corrective action documented in a NonConformance Report. With this particular problem identified, licensee personnel pursued other areas where similar wiring errors could have occurred. To your credit, you also inspected other work performed under this work order which revealed two other wiring errors which would have affected the operation of the 3B containment spray pump and the automatic start of Unit 4B and 4C intake cooling water pumps. We have reviewed this matter and determined that it represents a Severity Level IV violation. Pursuant to the provisions of 10 CFR Part 2, Appendix C, since the violation was licensee-identified, was promptly corrected, and could not reasonably be expected to have been prevented by the licensee's corrective action for a previous violation, a Notice of Violation is not being issued for this item.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. In preparing your response, you should give particular attention to explain those actions to be taken to improve the communication between your maintenance, engineering, and operations staffs. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Public Law No. 96-511.

Sincerely,

ORIGINAL SIGNED BY
E. NELSON GRACE

J. Nelson Grace
Regional Administrator

Enclosure:
Notice of Violation and Proposed
Imposition of Civil Penalty

cc w/encl: (See page 4)



Florida Power and Light Company

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cc w/encl:

- ✓ M. Wethy, Vice President
Turkey Point Nuclear Plant
- ✓ J. Baker, Plant Manager
Turkey Point Nuclear Plant
- ✓ W. Bladow, Plant QA Superintendent
- ✓ J. Arias, Jr., Regulatory and Compliance
Supervisor

Florida Power and Light Company

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