

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on July 20 - August 24, 1987, violations of NRC requirements were identified. The violations involved; the failure to meet Technical Specification (TS) requirements for sampling of the cold leg accumulator boron concentrations prior to heatup above 200F, the failure to maintain administrative control over a locked valve, the discovery of a sleeping compensatory firewatch and the failure to meet the TS requirement for testing the remaining emergency diesel generator (EDG) when the opposite EDG is out of service. In accordance with "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C (1986), the violations are listed below.

- A. Technical Specification 4.1, Operational Safety Review, requires that equipment and sampling tests shall be conducted as specified in Table 4.1-2. Item 10 of Table 4.1-2 requires that accumulator boron concentration be sampled prior to heatup above 200F.

Contrary to the above, on June 22, 1985, the Unit 4 primary coolant system was heated above 200F without prior performance of the boron concentration analysis for the 4C accumulator.

This is a Severity Level IV violation (Supplement I). This violation applies to Unit 4 only.

- B. Technical Specification 6.8.1 requires that written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Appendix A of USNRC Regulatory Guide 1.33.

1. Regulatory Guide 1.33, Appendix A, Item 1.c specifies that procedures should be developed to control equipment through locking and tagging.

Administrative Procedure 0-ADM-205, entitled Administrative Control of Valves, Locks, and Switches, revision dated July 18, 1987, requires, in Attachment 5, that valve 3-40-856 be locked.

Contrary to the above, on August 6, 1987, valve 3-40-856 was found not to be locked.

2. Regulatory Guide 1.33, Appendix A, Item 6.v specifies that procedures should be developed for combating emergencies and other significant events such as plant fires.

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Administrative Procedure 15500, entitled Fire Protection Program, revision dated July 9, 1987, section 9.4.1 requires in part that backup suppression be established as compensatory action during fire protection impairment of automatic fire suppression systems such as the halon system. Section 9.5.3 specifies, in part, that the posting of continuous firewatch is an acceptable compensatory action when the halon system is impaired. Temporary Procedure 347, entitled DC Equipment and Inverter Rooms Supplemental Cooling Monitoring and Standby Condition, revision dated June 25, 1987, section 5.1.1, requires that any time door 108A-1 is maintained open, a continuous firewatch shall be established to close the door (108A-1) within 60 seconds of sounding of the Halon Activation Alarm.

Contrary to the above, on July 29, 1987, the continuous fire watch posted as fire door 108A-1 to compensate for an impaired halon system was found asleep. Consequently, the effectiveness of the halon system might not have been re-established (through door closure) within the required 60 second time interval.

This is a Severity Level V violation (Supplement 1) which applies to Unit 3 only.

- C. TS 3.7.2.b states in part that power operation may continue if one diesel generator is out of service provided the remaining diesel generator is tested daily and its associated engineered safety features are operable.

Contrary to the above, the licensee failed to comply with the requirements of TS 3.7.2.b, in that on July 30-31, 1987, the A EDG was out of service for greater than 24 hours (26 hrs., 50 min.) without verifying the operability of the B EDG.

This is a Severity Level V violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Florida Power and Light Company is hereby required to submit to this Office within 30 days of the date of the letter transmitting this Notice a written statement or explanation in reply including (for each violation): (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

Luis A. Reyes, Director
Division of Reactor Projects

Dated at Atlanta, Georgia
this 11th day of September 1987

