

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 September 21 - October 19, 1987, a violation of NRC requirements was identified. The violation involved three examples of failure to implement approved procedures: The failure to properly implement off normal operating procedures for removal of a nuclear instrument from service and for adjustment of a critical heat tracing circuit thermostat and for failure to properly implement an administrative procedure which ensures control of locked valves. 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.

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.

Regulatory Guide 1.33, Appendix A, Item 5, recommends that procedures for abnormal, offnormal, or alarm conditions should contain the meaning of an annunciator, the source of the signal, the immediate operator action and the long-range actions.

Two examples of failure to implement Regulatory Guide 1.33, Appendix A, Item 5, were identified.

1. Off-Normal Operating Procedure 0-ONOP-048, entitled Off Normal Critical Heat Tracing System Temperature, revision dated June 26, 1985, requires, in Section 3.2, that if no degraded insulation or abnormal system operation is discovered, submit a Plant Work Order (PWO) to have Electrical Maintenance check the heat tracing thermostat.

Contrary to the above, on September 28, 1987, in response to a Heat Tracing Trouble alarm annunciator, a Nuclear Operator (NO), at the direction of the Unit 4 Reactor Control Operator (RCO), manipulated the thermostat for heat tracing circuit number 8 and failed to submit a PWO to have electrical maintenance check the heat tracing thermostat.

2. Off Normal Operating Procedure 4-ONOP-059.3, entitled Nuclear Instrumentation Malfunction, revision dated April 14, 1987, Section 5.3.1, requires the RCO to transfer the Comparator Channel Defeat Switch to the failed channel when one power range channel fails low during power operation-Mode 1.

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Contrary to the above, on October 2, 1987, with Unit 4 in Mode 1, the Unit 4 RCO failed to transfer the Comparator Channel Defeat Switch in response to power range nuclear instrument channel N-44 failure.

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

3. Administrative Procedure O-ADM-205, entitled Administrative Control of Valves, Locks, and Switches, revision dated August 11, 1987, requires, in Attachment 2, that the A Boric Acid Storage Tank (BAST) recirculation isolation valve, 344, be controlled locked open.

Contrary to the above, on October 3, 1987, valve 344 was found open but not properly locked.

This is a Severity Level IV violation (Supplement I).

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

Original Signed by  
Charles W. Hehl /for

Luis A. Reyes, Director  
Division of Reactor Projects

Dated at Atlanta, Georgia  
this 12th day of November, 1987

