

ENCLOSURE 1

NOTICE OF VIOLATION

Florida Power and Light Company
Turkey Point

Docket Nos. 50-250 and 50-251
License Nos. DPR-31 and DPR-41

During the Nuclear Regulatory Commission (NRC) inspection conducted on January 18 - February 25, 1988, a violation of NRC requirements was identified. The violation involved the failure to meet Technical Specification (TS) 6.8.1 requirements (three examples). In accordance with the "General Statements of Policy and Procedure for NRC enforcement Actions", 10 CFR Part 2, Appendix C (1987), the violation is listed below.

TS 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 and Section 5.1 and 5.3 of ANSI N18.7-1972.

A. ANSI N18.7-1972, Section 5.1.2, requires that procedures shall be followed; and the requirements for use of procedures shall be prescribed in writing.

1. Administrative Procedure 0103.41, entitled Caution Tag Clearance Procedure, Revision dated December 11, 1986, specifies that caution tags are used to identify unusual conditions or precautions that are required to be taken when operating equipment during unusual conditions. Caution Tag 2-1-88-1 was originated on February 2, 1988. It required that Unit 3 valve 3-50-449 be maintained open to prevent Differential Pressure Indication (DPI) 3-1402 from indicating off-scale high. The tag specified that the valve could be closed after Intake Cooling Water (ICW) strainer 1402 was cleaned.

Contrary to the above, on February 5, 1988, valve 3-50-449 was found closed and ICW strainer 1402 had not been cleaned. Consequently, DPI 3-1402 was reading off-scale high.

2. Administrative Procedure O-ADM-503, entitled Control and Use of Temporary System Alteration, Revision dated February 9, 1988, specifies that temporary system alterations be controlled by requiring that they be identified, reviewed, approved, documented and periodically reassessed. Section 4.1.2 specifies that an alteration includes removal of components within a system such that the design or configuration is changed.

Contrary to the above, prior to March 1987, two Unit 3 flow indicators, FI-3-1407 and FI-3-1409, were removed from the ICW system without administrative authorization. They remained absent until February 1988, when FI-3-1407 was reinstalled and temporary system alteration controls were imposed on the removal of FI-3-1409.



- B. Appendix A, of Regulatory Guide 1.33, specifies that procedures should be developed for the operation and surveillance of service water systems.

Operations Surveillance Procedure O-OSP-201.4, entitled Auxiliary Nuclear Plant Operator (ANPO) Daily Logs, Revision dated November 17, 1987, specifies an acceptance criterion of 17 to 50 pounds per square inch gauge (psig) for the discharge pressure of each Intake Cooling Water (ICW) pump.

Contrary to the above, procedure O-OSP-201.4 was not adequate, in that it contained non-conservative acceptance criteria. If ICW pump discharge pressure exceeded approximately 40 psig then system flow would not have been sufficient to meet design basis assumptions.

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 a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, Turkey Point, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include [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. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by
Floyd Cantrell (for)
Bruce A. Wilson, Chief
Reactor Projects Branch 2
Division of Reactor Projects

Dated at Atlanta, Georgia
this 15th day of April 1988