

NOTICE OF VIOLATION

Florida Power and Light Company
Turkey Point

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on February 22-25, 1988, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

- A. 10 CFR 50.47(b)(9) requires that adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

Turkey Point Emergency Plan, Section 1.4, Concept of Operations, Page 1-7, dated November 1, 1986, states that "... FPL maintains adequate facilities and equipment for detecting, assessing, and responding to emergencies."

Emergency Procedure 20126, Offsite Dose Calculations, dated October 25, 1985, requires that 15 minute averages of meteorological data from the Primary and Backup Meteorological Towers be used to determine the meteorological conditions for the calculations of offsite doses.

Contrary to the above, the licensee's offsite dose assessment calculations could be inaccurate and could result in significantly non-conservative dose estimates in the event of a radioactive release for the following reasons:

1. Required time-averaged (15 minutes averaged) meteorological data for use in Method 1, Table 1 of Emergency Procedure, "Offsite Dose Calculation," dated October 25, 1985, were not being used.
2. Hardware changes made to the meteorological equipment at the meteorological tower resulted in range changes for the delta temperature (ΔT) which were not reflected on the analog chart records in the Control Room. In addition, Control Room Operators were not aware that changes affecting the ΔT had been made. This could have resulted in offsite dose calculation errors as large as a factor of 150 in the non-conservative direction.

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

- B. 10 CFR 50, Appendix B, Criterion V, as implemented by the licensee's accepted Quality Assurance Program (FPLQAR-1-76A, accepted June 10, 1987), Section 5.2.2, requires that activities affecting quality be in accordance with approved procedures.

The Quality Assurance Manual, Procedure QP 5.1, dated November 3, 1980, Section 5.4, Step 8, requires that procedures shall be developed to implement the Plant Emergency Plan.

Emergency Procedure 20126, dated October 25, 1985, Section 8.4, Step 8.4.1, describes the Offsite Dose Calculation using the computer program.

Contrary to the above, the licensee failed to establish and implement a computer software control procedure to ensure maintenance and control of the Class A Dose Assessment Computer Model.

This is a Severity Level IV violation (Supplement VIII):

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 U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, 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 that 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 M. Ernst

J. Nelson Grace
Regional Administrator

Dated at Atlanta, Georgia
this 27th day of June 1988