

ENCLOSURE 1

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 October 3-7 and October 17-21, 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 (1988), the violations are listed below:

- A. 10 CFR 50 Appendix B, Criterion III requires measures be established to assure that applicable regulatory requirements and design basis are correctly translated into procedures and instructions. These measures shall provide for checking the adequacy of design.

Contrary to the above, the measures to assure that design basis are adequately transmitted to procedures and instructions were not adequate in that: the numerical value for "Fluid Velocity" used in the stress calculation for component cooling water (CCW) thermowell Nos. TI-4-663A-F in Bechtel Power Corporation Calculation 17712-183-J01, "Component Cooling Water Heat Exchanger Replacement, Unit 4 - thermowell stress analysis -local TIs" Revision 0 originated September 13, 1988, checked September 13, 1988, and approved September 14, 1988, could not be explained or supported by the engineer who originated the calculation, the checker who reviewed the calculation, or the engineer who approved the calculation.

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

- B. 10 CFR 50, Appendix B, Criterion X requires the establishment of an inspection program to verify conformance with documented instructions and procedures for accomplishing activities affecting quality. Work activities shall not proceed past hold points without the consent of authorized personnel. The above is implemented by Florida Power and Light (FP&L) Procedure QP 10.3, Revision 6, "Inspection and Surveillance", Paragraph 5.8.1, and FP&L Administrative Site Procedure ASP-2, Rev. 4, Paragraph 4.12. Mechanical Installation List No. MIL 88-006M, Revision 1, and Process Sheet No. P.S. 88-206, have been identified as the work and inspection controlling documents for the replacement of the CCW heat exchangers. Procedure ASP-2, Paragraph Nos. 5.3.4 and 5.5.3, requires Project Field Engineers (PFEs) and Quality Control (QC) inspectors to sign-off process sheet "hold-points" within 24 hours of the completion of the work activity or inspection.

Contrary to the above, the licensee has failed to establish an effective inspection program for the installation of the CCW heat exchangers as evidenced by the following:

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PDR ADDCK 05000250  
Q PNU



1. Both PS 88-206 and MIL 88-006M, state that sequencing is not required. Both documents contained "hold-points" which the licensee permitted to be accomplished out of sequence.
2. Two examples were noted where "hold-points" were signed off inadvertently when in point of fact, the required inspections had not been accomplished/completed. One case resulted in the "hold-point" being missed (only to be discovered during later document review).
3. Ten examples were noted where the PFEs or QC inspector sign-offs failed to comply with the 24 hour timeliness window, for "hold-point" sign-off in some cases by as much as ten calendar days.
4. The dates accompanying the PFE sign-off for work activity "hold-points" were, in some case, the date of the completion of the work activity and not the date of the actual sign-off itself.
5. Data intended to be included in the process sheet by the QC inspector, at the time of sign-off, was included by others during data review after the fact.

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

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, 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.



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Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

FOR THE NUCLEAR REGULATORY COMMISSION

ORIGINAL SIGNED BY  
ALAN R. HERDT

Alan R. Herdt, Chief  
Engineering Branch  
Division of Reactor Safety

Dated at Atlanta, Georgia  
this 23<sup>rd</sup> day of November 1988