

ENCLOSURE

NOTICE OF VIOLATION

Florida Power and Light Company
Turkey Point Units 3 and 4

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

During the NRC inspection conducted on September 26 through October 28, 1988; a violation of NRC requirements was identified. The violation involved the failure to meet the requirements of Technical Specification (TS) 6.8.1, two examples; failure to maintain an audible neutron flux monitor in the control room while in Mode 6; and use of an improper procedure to makeup to the refueling cavity. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", 10 CFR Part 2, Appendix C (1988), 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 Section 5.1 of ANSI N18-7-1972. ANSI N18-7-1972, Section 5.1.2 specifies that procedures shall be followed.

Administrative Procedure (ADM) 021, Technical Specification Implementation (TSI) Procedure, revision dated September 29, 1988, Section 3.1, requires that the requirements of the Interim Technical Specifications (ITS) be complied with unless the requirements are waived in accordance with the procedure or are less restrictive than existing TS. ITS 3/4 9.2 requires, in Mode 6, that an audible neutron flux monitor be OPERABLE in the control room and containment.

Contrary to the above, on October 13, 1988, with Unit 4 in Mode 6, the audible neutron flux monitor in the control room was silenced by operations personnel. Although this requirement was more restrictive than existing TS, the operators did not obtain a waiver.

Administrative Procedure 0109.1, Preparation, Revision, Approval, And Use Of Procedures, revision dated, September 8, 1988, Section 8.2.2, specifies: If a procedure step cannot be completed as written or if in the judgement of the individual performing a procedure, completion of a specific step could result in an unsafe condition, conduct of the procedure shall be stopped, the system/components placed in a safe condition and the Plant Supervisor-Nuclear (PS-N) shall be notified. The required corrective actions shall be determined by the PS-N.

Contrary to the above, on October 15, 1988, the Unit 4 RCO did not consult the PS-N when he could not perform a makeup with normal blend due to primary water being isolated to the blender. Instead, the RCO attempted

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to makeup using solely boric acid using section 8.8 of AP 0103.32, Cold Shutdown Conditions, dated September 22, 1988. The intent of section 8.8 was not to provide steps for makeup and as a result the charging pump discharge line became momentarily clogged.

This is a severity level IV violation.

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

LSI

Luis A. Reyes, Director
Division of Reactor Projects

Dated at Atlanta, Georgia
this ~~23rd~~ day of November 1988

