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 April 14 - May 12, 1986, violations of NRC requirements were identified. The violations involved the failure to establish and implement procedures, the failure to properly implement a temporary procedure change, and the failure to maintain an accurate system drawing. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

A. Technical Specification 6.8.1 requires that written procedures and administrative policies be implemented that meet or exceed the requirements and recommendations of sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33.

Appendix A of USNRC Regulatory Guide 1.33 states that administrative procedures specifying procedure adherence should be established.

Administrative Procedure 0-ADM-201, Upgrade Operations Procedure Usage, dated December 4, 1985, requires, in section 5.5.1, that operating procedures be followed exactly and that all personnel comply with approved procedures applicable to the activity or circumstance being performed.

1. Operating Procedure (OP) 1004.2, Reactor Protection System - Periodic Test (Unit 3 Only), dated February 7, 1986, requires, in section 8.61, that the operator proceed to protection instrument rack 41 to perform train "B" reactor trip breaker testing. Section 8.63 directs the operator to trip the "B" reactor trip breaker.

   Contrary to the above, on May 2, 1986, an operator failed to properly implement OP 1004.2, in that while performing step 8.61 he remained at protection instrument rack 36 and, while performing step 8.63, tripped the "A" reactor trip breaker thereby inadvertently tripping the Unit 3 reactor.

2. OP 4304.1, Emergency Diesel Generator - Periodic Test Load on 4KV Bus, dated April 1, 1986, requires, in section 8.3, that the starting air supply valve be closed for the emergency diesel generator (EDG) being tested. Section 8.7 requires that the starting air supply valve for the EDG be reopened after completion of sections 8.3 through 8.6.

Contrary to the above, on May 2, 1986, an operator failed to properly implement OP 4304.1 on two consecutive occasions, in that during an initial start of the "B" EDG, Section 8.7 was not implemented, causing the EDG to fail to start. While realigning the "B" EDG for a subsequent start attempt, the operator improperly implemented Section 8.3 in that he closed the starting air supply valve for the "A" EDG, rendering the "A" EDG temporarily inoperable.

3. OP 4304.1, Emergency Diesel Generator - Periodic Test Load on 4KV Bus, dated April 1, 1986, requires, in Section 8.11, that the fuel oil prime pushbutton be depressed and that fuel oil pressure be verified to be approximately 25 to 30 psig.

   Contrary to the above, on May 9, 1986, an operator failed to properly implement OP 4304.1 in that, during a lineup to start the "B" EDG, Section 8.11 was not properly implemented because the operator pressed the local start pushbutton instead of the fuel oil prime pushbutton. This action caused an unexpected local start of the "B" EDG.

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

B. Technical Specification 6.8.1 requires that written procedures and administrative policies be established and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33.

Appendix A of Regulatory Guide 1.33 states that procedures should be established for the startup, operation and shutdown of safety-related equipment including instructions relative to emergency power sources such as diesel generators.

Procedure 0-OP-023, Emergency Diesel Generator, dated March 25, 1986, provides instructional guidance for the startup, normal operation and shutdown of the EDG system.

Contrary to the above, as of May 12, 1986, procedure 0-OP-023 did not adequately establish procedures for the startup and operation of the "A" and "B" EDGs, in that:

1. the procedure did not address the control of valves 292 and 293 for either the "A" or "B" EDG radiator cooling water system drains, and the drain valves for the "A" or "B" EDG fuel oil skid tank;

2. the procedure addressed the position of skid tank solenoid valve SV-3-3522 bypass line isolation valve 70-048A, which has not been installed for the "A" EDG; and

3. the procedure did not address the control of valve 269B for the starting air flask drains for the "B" EDG.

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

C. 10 CFR 50, Appendix B, Criterion VI, as implemented by FPL Topical Quality Assurance Report (FPL-NQA-100A) Revision 8, TQR 6.0, Document Control, requires, in part, that the distribution of controlled documents, such as drawings, which provide guidance, specifications or requirements affecting the quality of nuclear safety-related structures, systems and components, shall be controlled and that Quality Procedures shall delineate the control measures for drawings, including direction for the review for adequacy.

FPL Quality Assurance Manual, Quality Procedure (QP) 6.6, Revision 1, delineates requirements for maintaining the drawing update program and assuring that drawings reflect the as-constructed configuration of the safety-related system.

Administrative Procedure (AP) 0103.10, Using and Updating Plant Drawings, dated March 3, 1983, implements the above requirements and specifies that drawings shall be field verified to ensure proper accuracy.

Contrary to the above, as of May 13, 1986, drawing 5610-T-E-4536, Revision 0, sheets 1 and 2, entitled "Diesel Generator A" and "Diesel Generator B", respectively, were not accurate, in that:

1. the drawing sheets failed to show the existence of a fuel oil skid tank drain valve for each EDG;

2. the drawing sheets showed that valves 292A and 292B, drains for the EDG radiator cooling system, were normally closed valves when actually they were normally open valves;

3. numerous valve numbers specified on the drawing sheets conflicted with the valve numbers utilized by approved operating procedure 0-OP-023; and

4. drawing sheet 1 showed the presence of starting air flask drain valve 269A, which does not exist, and drawing sheet 2 showed a starting air flask drain piping configuration which was not accurate.

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

D. Technical Specification 6.8.1 requires that written procedures and administrative policies be implemented that meet or exceed the requirements and recommendations of sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33.

Appendix A of USNRC Regulatory Guide 1.33 states that administrative procedures specifying procedure adherence should be established.

AP 0190.19, Control of Maintenance on Safety Related and Quality Related Systems, revision dated January 8, 1986, states that the Plant Supervisor-Nuclear (PSN) may authorize work to start prior to obtaining Quality Control (QC) approval of the Plant Work Order (PWO) when the plant is in a load

threatening condition or in an Action Statement of TS 3.0.1. To immediately commence work, the PSN shall originate a PWO and assign a class "AA" work priority and sign the permission to start work block. Maintenance technicians are required to thoroughly document all actions taken on the PWO, and the PWO shall be made available for subsequent review by the QC Department within one day.

1. Contrary to the above, on April 9, 1986, PWO 6230 was issued as a priority class "AA" work order but the maintenance technician did not thoroughly document his maintenance actions, in that he failed to originate a calibration record sheet for a flow meter he installed. Additionally, he failed to indicate on the PWO that he had performed the required meter calibration.

2. Contrary to the above, on May 3, 1986, the PSN authorized work to start on priority class "AA" PWO 6379 when the plant was not in a load threatening condition nor in an Action Statement of TS 3.0.1. Additionally, the PWO was not made available for review by the QC department within one day.

This is a Severity Level IV violation (Supplement I) and applies to Unit 3 only.

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 reasons 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

Luis A. Reyes, Acting Director
Division of Reactor Projects

Dated at Atlanta, Georgia
this 20 day of June 1986