

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 October 14 - November 3, 1986, a violation of NRC requirements was identified. The violation involved the failure to implement post-maintenance testing requirements for valves in the inservice inspection and testing program including containment isolation valves. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violation is listed below:

Technical Specification (TS) 3.3.3 requires that the containment isolation valves for Phase A containment isolation, Phase B containment isolation and containment ventilation isolation shall be operable with the isolation times of each power operated or automatic valves within the limits established for testing in accordance with Section XI of ASME Boiler and Pressure Vessel code and applicable Addenda as required by 10 CFR 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i).

Article IWV-3200 of ASME Boiler and Pressure Vessel code Section XI, 1980 edition, entitled Valve Replacement, Repair, and Maintenance, specifies that when a valve has undergone maintenance which could affect its performance it shall be tested to demonstrate that the performance parameters which could be affected by the maintenance are within acceptable limits prior to the time it is returned to service. Footnote 1 further defines adjustment of stem packing as maintenance that could affect valve performance parameters.

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

Administrative Procedure (AP) 0190.28, revision dated October 7, 1986, entitled Postmaintenance Testing requires, in Appendix D, that valves covered by the IST program receive a visual leakage test and a stroke time test subsequent to the performance of valve packing adjustments.

Operating Procedure (OP) 0209.1, revision dated September 11, 1986, entitled Valve Exercising Procedure implements the post-maintenance testing requirements of AP 0190.28 and specifies that data obtained during IST valve testing be evaluated and approved using Appendix P, Valve Post Maintenance Test Sheets.

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Contrary to the above, as of October 27, 1986, valve testing was not performed as required, in that:

1. Packing adjustments were performed on two containment Phase A isolation valves and the valves were not tested to demonstrate that the performance parameters which may have been affected were within acceptable limits prior to returning the valves to service.
2. Packing adjustments were performed on eight other motor operated valves and the post-maintenance test requirements of AP 0190.28 and OP 0209.1 were not implemented.

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 to this Office within 30 days of the date of the letter transmitting this Notice a written statement or explanation in reply including: (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

Original Signed by  
Luis A. Reyes /for

Roger D. Walker, Director  
Division of Reactor Projects

Dated at Atlanta, Georgia  
this 25 day of November 1986