

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 September 9 - October 16, 1986, violations of NRC requirements were identified. The violations involved the failure to establish adequate procedures, the failure to implement procedures, and the failure to provide adequate corrective action for identified deficiencies. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violations are listed below:

A. Technical Specification (TS) 6.8.1 requires that written procedures and administrative policies be established 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.

1. Appendix A of USNRC Regulatory Guide 1.33 requires procedures for the proper operation of safety related systems such as the control rod drive system, nuclear instrumentation system and the reactor control and protection system.

Temporary Operating Procedure (TOP) 233, Functional Test of PC/M 84-209 Power Mismatch Modification and PC/M 84-211 Turbine Runback Modification, revision dated January 10, 1986, specifies required testing to be performed subsequent to the installation of the modifications. Step 4.11 of TOP 203 specifies that the procedure can be implemented with the Unit 4 reactor in cold shutdown. Step 8.5 specifies that reactor power be simulated to be above 10% power. Step 8.29 requires the closure of the reactor trip breakers to allow certain control rods to be raised off the core bottom.

Contrary to the above, TOP 233 was not an adequate procedure, in that it could not be performed during cold shutdown conditions. Performance of steps 8.5 and 8.29 would result in an unplanned actuation of the reactor protection system due to the automatic reopening of the reactor trip breakers. Thus the control rods could not be raised off the core bottom and the procedure could not fulfill its intended function. This deficiency resulted in an unanticipated actuation of the Unit 4 reactor protective system on August 5, 1986.

2. Appendix A of USNRC Regulatory Guide 1.33 requires that procedures be developed to implement a plant fire protection program.

ANSI N18.7-1972, section 5.3.5, requires, in part, that permission to release equipment for maintenance be granted by responsible operating

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personnel. Prior to granting permission, such operating personnel shall verify that the equipment or system can be released, and if so, how long it may be out of service. The granting of permission by the operations group shall be documented. Equipment and systems in a controlled status shall be clearly identified. Strict control measures for such equipment shall be enforced.

Contrary to the above, on six separate occasions between June 4 and June 26, 1986, fire doors were propped open, rendering them out of service as effective fire barriers. The removal of the otherwise operable fire doors from service was neither controlled nor authorized and the doors remained out of service for an unknown period of time. No plant procedure existed specifying the method by which fire doors should be controlled.

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

- B. 10 CFR 50, Appendix B, Criterion XVI, as implemented by FPL Topical Quality Assurance Report (FPL-NQA-100A) Revision 8, TQR 16.0, Revision 4, Corrective Action, requires, in part, that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

FPL Quality Assurance Manual, Quality Procedure 16.1, Revision 8, delineates requirements for assuring that conditions adverse to quality are corrected.

Procedure O-ADM-913, revision dated May 23, 1986, entitled Corrective Action for Conditions Adverse to Quality, itemizes the mechanisms by which conditions adverse to quality are promptly identified, tracked and corrected.

Contrary to the above, the licensee failed to maintain an effective program for the correction of conditions adverse to quality, in that:

1. Corrective actions, implemented in 1985 when four TS surveillances were not performed within their required periodicities, failed to prevent, between January and June 1986, nine additional surveillances from being performed at periodicities longer than those allowed by TS; and
2. Corrective actions, taken in September 1985 and June 1986 subsequent to the issuance of separate audit findings which specified that Administrative Procedure (AP) 0103.36, Control of Operator Aids and Temporary Information Tags, was not being correctly implemented, were ineffective, in that they did not result in the correct implementation of the procedural requirements. Consequently, an NRC audit conducted in September 1986, identified additional similar discrepancies associated with the administration of the procedure.

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



- C. TS 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 procedures should be established specifying: (1) authorities and responsibilities for safe reactor operation; and (2) operation of the main steam system.

1. Administrative Procedure (AP) 0103.2, Responsibilities of Operators and Shift Technicians on Shift and Maintenance of Operating Logs and Records, revision dated July 29, 1986, requires, in section 5.4.2, that the Reactor Control Operator (RCO) shall report all significant plant changes, unsafe operating trends or unsafe conditions to an on-shift Senior Reactor Operator (SRO). Section 5.4.3 of AP 0103.2 requires that the RCO maintain direct sensory perception of, and access to, Unit status and safety system monitoring and controls.

Contrary to the above, on August 9, 1986, during a plant heatup, a Unit 4 RCO failed to adequately monitor steam generator water level, allowing the level in the 4C steam generator to decrease to the lo-lo alarm setpoint. The trend toward decreasing level existed for several hours prior to reaching the lo-lo alarm setpoint and the condition was not reported to an SRO. This personnel error resulted in the automatic actuation of the Auxiliary Feedwater System, as per system logic design, on lo-lo steam generator level.

2. Procedure 4-OP-065.2, Auxiliary Feedwater (AFW) and Main Steam Isolation Valve (MSIV) Backup Nitrogen Gas Supply System, revision dated August 12, 1986, requires, in attachment 2, that MSIV nitrogen station header isolation valves 4-5202, 4-5237 and 4-5272 be closed during normal system alignment. The valves had last been verified to be closed on August 21, 1986, as required by On-The-Spot-Change (OTSC) 4468 to 4-OP-065.2.

Contrary to the above, on September 25, 1986, the valves were found to be open.

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 (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.



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FOR THE NUCLEAR REGULATORY COMMISSION



Roger D. Walker, Director
Division of Reactor Projects

Dated at Atlanta, Georgia
this 9th day of December 1986

