



MARCH 14 1988

L-88-118

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Reply to Notice of Violation
Inspection Report 87-51

Florida Power & Light Company has reviewed the subject inspection report and a response is attached. The revised submittal date of this report was discussed and concurred with by your NRC Region II Staff.

Very truly yours,

A handwritten signature in cursive script, appearing to read "W. F. Conway for".

W. F. Conway
Acting Group Vice President
Nuclear Energy

WFC/SDF/gp

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator,
Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

SDF/026.IR

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ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NO. 50-250, 50-251
IE INSPECTION REPORT 250-87-51 & 251-87-51

FINDING:

Technical Specification 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 Appendix A of USNRC Regulatory Guide 1.33.

Appendix A of Regulatory Guide 1.33 recommends that administrative procedures should be developed to address authorities and responsibilities for safe operation, shift and relief turnover, and log entries.

FINDING 1:

Administrative Procedure (AP) 0103.2, Shift Turnover Requirements, states in part, the off-going shift shall pass on plant status by making appropriate checks and/or remarks on the applicable shift relief checklist.

Contrary to the above, the requirements of AP 0103.2 were not properly implemented in September 1987 in that, on numerous occasions shift relief turnovers were not documented in the Reactor Operator's (RCO) logbook and checklists were not properly and thoroughly completed.

RESPONSE 1:

- 1) FPL concurs with the finding.
- 2) The reason for the violation is personnel error, in that the operators misinterpreted the requirements of AP-0103.2 concerning the completion of relief check sheets and logbook entries.
- 3) Entries were made in the Short Term Instruction and Shift Information Book reminding the operators to continuously pay attention to detail. The Management on Shift observers have noted continuous improvement in this area since this event's occurrence.
- 4) a). The RCO Shift Relief Checklists of AP-0103.2 were revised to enhance their clarity, simplicity and user friendliness.

- b) Training Brief 215, clarifying the requirements of AP-0103.2 on formal turnovers, was issued.
 - c) The Plant Supervisor Nuclear (PSN)/Assistant PSN, Nuclear Watch Engineer, Nuclear Plant Operator (NPO)/Nuclear Turbine Operator and Assistant NPO Shift Relief Checklists of AP-0103.2 were also revised to enhance their clarity, simplicity and user friendliness.
- 5) a) Full compliance for item 3 above was achieved by October 29, 1987.
- b) Full compliance for item 4a above was achieved by November 21, 1987.
- c) Full compliance for item 4b above was achieved by November 24, 1987.
- d) Full compliance for item 4c above was achieved by December 31, 1987.

FINDING 2:

Administrative Procedure O-ADM-207, entitled, Operation Instructions in the Event of a Situation Not Addressed by Procedures, revision dated July 2, 1987, requires that all actions performed under the procedure shall be documented in the Plant Supervisor Nuclear's (PSN) logbook and that documentation of actions taken be transmitted to the Plant Nuclear Safety Committee for review.

Contrary to the above, on September 13, 1987, actions were taken under the guidelines of Procedure O-ADM-207 which were not promptly recorded in the Plant Supervisor's logbook. Subsequently, documentation of the actions taken were not reviewed by the Plant Nuclear Safety Committee (PNSC).

RESPONSE 2:

- 1) FPL concurs with the finding.
 - 2) The reason for the violation is personnel error, in that the operators failed to follow the directions of O-ADM-207 by not documenting the actions taken.
 - 3) The PSN and Assistant PSN on shift at the time of the event were counselled on the proper usage of O-ADM-207 in that log entries have to be made in the PSN log on actions taken.
 - 4) The instructions now included as attachments in O-ADM-207 will be converted into checksheets. This will assure documentation of actions taken and performance of subsequent PNSC review.
- 5) a) Full compliance for item 3 above was achieved by November 5, 1987.
- b) Full compliance for item 4 above will be achieved by May 27, 1988.

