

ENCLOSURE 1

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 February 25 through March 25, 1988, a violation of NRC requirements was identified. The violation involved three examples of the failure to meet the requirements of Technical Specification (TS) 6.8.1. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement actions," 10 CFR Part 2, Appendix C (1987), 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 Appendix A of USNRC Regulatory Guide 1.33.

Regulatory Guide 1.33, Appendix A, Item 8.b.(1).(r), specifies that specific procedures should be written for surveillance tests and inspections for the auxiliary feedwater (AFW) system.

1. Operating Procedure 0204.2, entitled Periodic Tests, Checks, and Operating Evolutions, revision dated February 11, 1988, requires in Section 8.4.7, that the Unit 3 AFW Backup N2 Supply Station No. 1, Trains 1 and 2, on and off-line bottle pressures be verified. Step 6 requires the pressure indicators (PI) be vented through the Bottle Outlet PI Test Connections and that the valves be closed and recapped.

Contrary to the above, on February 24, 1988, valve 3-40-1688, vent valve Train 1 Bottle 1, AFW N2 Backup was found lockwired open and mechanically capped.

Regulatory Guide 1.33, Appendix A, Item 1.c, specifies that written procedures should be developed for equipment control.

Two examples of failure to implement Regulatory Guide 1.33, Appendix A, Item 1.c. were identified.

2. AP 0103.4, entitled In-Plant Equipment Clearance Orders, revision dated February 2, 1988, Section 4.21, specifies that temporary lifts shall be used to perform testing evolutions that require rehangng the clearance upon the completion of the test. Section 8.7.3 further specifies that a temporary lift should not be in effect for more than 24 hours.

Contrary to the above, on three occasions, clearance order 4-87-11-23 for valve 4-349 G, the 4B Boric Acid Transfer Pump (BATP) Discharge pressure indication isolation valve, was not being maintained.

- a. On February 11, 1988, valve 4-349 G was found opened on a Temporary Lift dated January 26, 1988, for the Inservice Testing (IST) of the 4B BATP. The Temporary Lift was not released upon completion of the IST, thus the valve was left open.
  - b. On February 17, 1988, valve 4-349 G was found open and clearance tag 4-87-11-23 was missing. There was no record of a Temporary Lift which would open the valve.
  - c. On March 3, 1988, valve 4-349G was again found open on a Temporary Lift dated February 29, 1988.
3. AP 0103.4, also provides, in section 8.3.12, instructions for tag-out and removal of clearance orders. Clearance order 3-88-061, dated March 19, 1988, required that valve 4-371, 4A Intake Cooling Water heat exchanger inlet isolation, be independently verified in the open position upon removal of the clearance tags.

Contrary to the above on March 19, 1988, valve 4-371 was found only to be approximately one-fourth open following removal of clearance 3-88-061, therefore reducing the required intake cooling water flow through the heat exchanger.

This is a Severity Level V 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.

FOR THE NUCLEAR REGULATORY COMMISSION

**Original Signed By**  
**BRUCE A. WILSON**

Bruce A. Wilson, Chief  
Reactor Projects Branch 2  
Division of Reactor Projects

Dated at Atlanta, Georgia  
this 26<sup>th</sup> day of April, 1988