

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 NRC inspection conducted on November 24 - December 22, 1988, a violation of NRC requirements was identified. The violation involved failure to meet the requirements of TS 6.8.1, two examples. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", 10 CFR Part 2, Appendix C (1988), 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 Section 5.1 of ANSI N18.7-1972. ANSI N18.7-1972, Section 5.1.2 specifies that procedures shall be followed.

- a. Administrative Procedure 0103.4, In-Plant Equipment Clearance Orders, revision dated August 26, 1988, specifies the required instructions to obtain, issue and release clearances to ensure safety and protection of plant personnel and equipment.

Contrary to the above, the following examples were identified in which clearances were not properly executed:

On October 15, 1988, MSIV 4B was found partially open during the Unit 4 containment integrity walkdowns. The valve was tagged closed under a clearance.

On November 17, 1988, operators attempted to place MOV-4-750 on its' backseat for repacking. The valve would not open electrically from the control room. This was due to an ongoing Plant Change/Modification (PC/M) being implemented for the MOV.

On November 18, 1988, valve 4-50-324, 4A ICW/CCW Basket Strainer Inlet Valve, was found closed. The valve was tagged open under clearance 4-88-11-022R.

On November 21, 1988, condensate was spilled into the turbine building area, on two occasions, through disassembled valves 4-20-121 and 4-20-221, 3-way valves for 4A and 4B feedwater pump discharge. The clearances listed on the PWOs to work the two valves were inadequate to provide proper isolation for the work being performed.

On November 22, 1988, the discharge valve for the 4A feedwater pump, MOV-4-1420, was found to be fully open with two separate clearance tags on the manual operator of the valve that required the valve to be in the shut position.



On December 2, 1988, during the performance of safeguards testing on Unit 3, the "A" Steam Generator feed bypass valve, FCV-3-479, failed to close when required on an isolation signal. Subsequent licensee investigation found the fuses in the circuit that provided the close signal to the valve pulled out and in a polybag with clearance 3-87-10-101. The clearance was issued and the fuses pulled on November 3, 1987, and had been in that condition since that date. Review of the Clearance Book indicated that the clearance did not exist in the Clearance Book or the index.

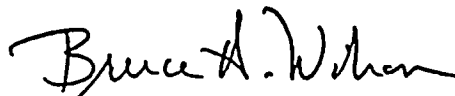
- b. Operating Procedure (OP)-041.2, Pressurizer Operation, dated December 3, 1988, requires that the pressurizer heaters and/or sprays be used to maintain Reactor Coolant System (RCS) pressure between 330 and 380 psig while heating up the pressurizer.

Contrary to the above, on December 9, 1988, the Unit 3 Reactor Control Operator (RCO) failed to maintain RCS pressure below 380 psig. The pressure increased until the Overpressure Mitigation System (OMS) setpoint of 400 to 430 psig was reached. This resulted in the 455C, Power Operated Relief Valve (PORV) opening automatically to reduce RCS pressure.

This is a Severity Level IV Violation.

Pursuant to the provisions of 10 CFR 2.201, Florida Power and Light Company is hereby required to submit a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include [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. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

FOR THE NUCLEAR REGULATORY COMMISSION



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

Dated at Atlanta, Georgia
this 24th day of January 1989