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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME AUTHOR AFFILIATION
 CONWAY, W.F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

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SUBJECT: Responds to violations noted in Insp Repts 50-250/89-02 & 50-251/89-02.

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P.O. Box 14000, Juno Beach, FL 33408-0420

MARCH 27 1989

L-89-108
10 CFR 2.201


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 89-02

Florida Power & Light Company has reviewed the subject inspection report and pursuant to 10 CFR 2.201 the response is attached.

Very truly yours,


W. F. Conway
Senior Vice President - Nuclear

WFC/RHF/gp

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

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PDR ADOCK 05000250
Q PDC

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ATTACHMENT 1
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-250/89-02 AND 50-251/89-02

Finding

Criterion V of Appendix B to 10 CFR Part 50, as implemented by the licensee's accepted Quality Assurance Program (FPL QAR-1-76A, dated June 10, 1987), requires that activities affecting quality be in accordance with approved procedures.

Section 5.4.8 of Procedure QP 5.1 (Revision 3) of the licensee's Quality Assurance Manual requires that procedures be developed to implement the Plant Emergency Plan.

Emergency Procedure 20101 (Duties of the Emergency Coordinator) specifies an Alert declaration upon determination of Reactor Coolant System (RCS) leakage exceeding 50 gpm, followed by notification to the State of Florida within 15 minutes and the NRC within 60 minutes.

Contrary to the above, on January 7, 1989, the licensee failed to promptly classify an event involving Unit 3 RCS leakage greater than 50 gpm and to make timely notification to the State of Florida and the NRC.

Response

- 1) FPL concurs with the violation.
- 2) The violation was caused by personnel error, in that, operations personnel failed to declare an emergency event and make proper notifications as required by procedure EPIP-20101 "Duties of Emergency Coordinator." Operations personnel recognized that the event met the criteria for an Alert, however, due to the short duration of the event and the fact that the event was terminated prior to classification, operations personnel decided not to declare the event.
- 3)
 - a) Following discussions with the Plant Manager, the Nuclear Regulatory Commission Operations Center was notified via the Emergency Notification System.
 - b) Affected state and county officials were notified.
 - c) The Operations Superintendent issued a memo reinforcing the Plant Supervisor-Nuclear's (PSN) responsibility for prompt emergency event classification.
 - d) The Plant Manager issued a memo to the PSN's delineating the PSN responsibility for prompt classification and notification of emergency events.



- 4) a) Procedure EPIP-20101 was revised to explicitly require that events of short duration be classified and notifications made, even if the event is classified after termination.
- b) Shift briefings were held with licensed operations personnel on shift to reinforce the responsibilities of the Emergency Coordinator and FPL regarding notification of emergency events.
- c) The PSN's have been tested in order to ensure their understanding of the requirements for classification and notification of emergency events, and to evaluate the effectiveness of the corrective actions described above. Results indicate that the PSN's have an adequate understanding of their responsibilities in this area.
- 5) a) The action described in 3a above was completed on January 8, 1989.
- b) The action described in 3b above was completed on January 9, 1989.
- c) The action described in 3c above was completed on January 12, 1989.
- d) The action described in 3d above was completed on March 11, 1989.
- e) The action described in 4a above was completed by March 15, 1989.
- f) The action described in 4b above was completed by March 16, 1989.
- g) The action described in 4c above was completed by March 21, 1989.

2-1-2

