

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 Nuclear Regulatory Commission (NRC) inspection conducted on October 28 through November 8, 1991, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion III, Design Control, states in part, that design control measures shall provide for verifying or checking the adequacy of design, ... be established for the identification and control of design interfaces and for coordination among participating organizations. Florida Power and Light Company's implementing Quality Instruction, QI 3-PTN-1, Design Control, requires that design control measures shall provide for verifying or checking the adequacy of design, such as by performance of design reviews, or by performance of a suitable testing program.

Contrary to the above, adequate controls were not in place during the exchange of engineering data between the vendor and the Florida Power and Light Company staff to insure that complete and accurate programmable constants and programmable components were installed in the Eagle 21 system. Between September 27 and October 5, 1991, the licensee identified that the Eagle 21 portion of the Reactor Protection System (Tuning Constants, Resistance Temperature Device constants, and Scaling Factor) contained non-plant specific settings that were not acceptable for proper operation of Overpower Delta T and Overtemperature Delta T.

This is a Severity Level IV violation (Supplement 1).

- B. Technical Specification 2.2.1 requires reactor trip system instrumentation and interlock setpoints be set consistent with the trip setpoint values shown in Table 2.2-1. In TS Table 2.2-1, Overtemperature Delta T refers to Note 1, and Overpower Delta T refers to Note 3. Table 2.2-1 Note 1 and Note 3, both define Delta T Subzero as the indicated Delta T at rated thermal power.

Contrary to the above, on October 7, 1991, the licensee identified that the design Delta T Subzero (56.1 degrees F) was being used in lieu of the indicated Delta T Subzero for computing the Overpower Delta T and Overtemperature Delta T setpoints.

This is a Severity Level IV violation (Supplement 1).

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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 U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 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 of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. 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. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

*Jon R. Johnson*  
for Luis A. Reyes, Director  
Division of Reactor Projects

Dated at Atlanta, Georgia  
this 2nd day of January, 1992