

APPENDIX A

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

As a result of the inspection conducted on September 26 - October 25, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

1. Technical Specification 3.4.2.6 requires that two containment spray pumps be operable during normal power operation.

Contrary to the above, both Unit 4 containment spray pumps were inoperable during power operations for approximately 50 hours commencing from October 2, 1983.

This is a Severity Level IV Violation (Supplement I).

2. 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 Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USNRC Regulatory Guide 1.33.

The licensee failed to comply with Technical Specification 6.8.1 on several occasions. Separate occasions are discussed in a through e, listed below:

- a. Licensee Administrative Procedure (AP) 0103.2, dated September 22, 1983, requires operators to correct or document problems with annunciators and indicators.

Contrary to the above, the following annunciator and indicator problems existed without corrective or documentary actions being taken until questioned by the resident inspector on October 18 (Items 1 and 2) and October 11 (Item 3):

- (1) A failed pen trace on channel 2 of the Unit 4 power range recorder (#426) such that channel 2 indicated approximately 60% power while the reactor was operating at 100% power.
- (2) A failed startup rate meter on the Unit 3 source range nuclear instrument (N-32) such that the control room meter indicated a constant positive startup rate of 0.75 decades per minute.
- (3) Removal of the unit 4 480Vac "E" transformer low ground and high temperature annunciator nameplate such that the annunciator could not be identified by visual observation.

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- b. Steps 4.3 and 4.5 of O.P. 11550.1, Radiation Work Permit, require that personnel who enter an area where an RWP is required be aware of radiological conditions, clothing requirements and special instructions listed on the RWP. In addition, all contamination control requirements shall be met prior to beginning work under an RWP.

Contrary to the above, two individuals (TLDs 504 and 11680 on RWP 161) failed to sign out with Health Physics, on Form HP-2, after exiting a locked high radiation area on October 13, 1983. In addition, one individual (TLD 13504) did not meet the clothing requirements of RWP-55 on October 24, 1983.

- c. Licensee Operating Procedure (OP) 13514.2, dated June 25, 1981, requires technicians to document both the failure of the local leak rate test (if applicable) and any problems encountered while performing the test.

Contrary to the above, on October 16, 1983, a technician failed to indicate that the local leak rate test of the emergency air lock was unsuccessful as required by OP 13514.2, step 8.3.5. Additionally, he failed to document problems associated in completing the test as required by OP 13514.2, step 9.2.

- d. Step 8.3.4 of administrative procedure, A.P. 103.2, Duties and Responsibilities of Operators on Shift and Maintenance of Operating Logs and Records, requires that the oncoming operator(s) review their station's Log Book for the previous 24 hours and current Log Sheets, then initial the left hand column next to their shift entry.

Contrary to the above, on October 2, 1983, the oncoming operator did not perform an adequate review of the log sheets and did not indicate with an initial in the log sheet left hand column.

- e. Step 8.16 of O.P. 205.2, Reactor Shutdown - Hot to Cold Shutdown Condition, requires that upon shutting the A and/or B containment spray pump isolation valves 891A and B, the valves be closed, locked and tagged.

Contrary to the above, the operator who mistakenly closed these valves on Unit 4 on October 2, 1983, failed to tag the valves he had closed and by his omission, disabled the independent verification of his actions as was required by the equipment clearance order.

Collectively these items constitute a Severity Level IV Violation (Supplement I).

3. Technical Specification 6.8.3 requires that changes to the procedures governed by TS 6.8.1, if made, shall be approved by two members of the plant management staff, at least one of whom holds a Senior Operating License on the unit affected.

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Contrary to the above, on or before October 19, 1983, a procedural change was made to Operating Procedure 16200, entitled "Manipulator Crane Operating Instructions" and dated September 29, 1983. The change was not approved by two members of the plant management staff prior to being utilized.

This is a Severity Level V Violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Date: JAN 09 1984