

ENCLOSURE 1

NOTICE OF VIOLATION

Florida Power and Light Company  
Turkey Point

Docket Nos. 50-250 and 50-251  
License Nos. DPR-31 and DPR-41

The following violations were identified during an inspection conducted on March 1 - April 6, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

Technical Specification (TS) 6.8.1 requires that written procedures and administrative policies shall be 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.

1. Administrative Procedure (AP) 0103.4, "In-Plant Equipment Clearance Orders" establishes detailed procedures for granting and releasing electrical and mechanical system clearances. Section 5.0 of AP-0103.4, establishes individual responsibilities to be fulfilled during the execution of clearance orders.

- a. Section 5.2 of AP-0103.4 requires that valve tagging shall be done only on orders authorized by the Nuclear Watch Engineer or the Plant Supervisor - Nuclear and tags shall be issued by the Nuclear Watch Engineer or the Reactor Control Operator.

Contrary to the above, as of March 27, 1984, Section 5.2 of AP-0103.4 had not been properly implemented in that numerous clearance tags were hung on vent and drain valves in Unit 4 containment which had neither been authorized or issued by any Nuclear Watch Engineer, Plant Supervisor - Nuclear or Reactor Control Operator nor were they aware of the tags.

- b. Section 5.6 of AP-0103.4 requires the Reactor Control Operator to insure that clearance forms are properly filled out and to submit all safety-related clearances to the Nuclear Watch Engineer and/or the Plant Supervisor - Nuclear for final review.

Contrary to the above, as of March 26, 1984, Section 5.6 of AP-0103.4 had not been properly implemented in that tag #42 of clearance #3-140 was improperly filled out. The desired position of breaker 340748 (motor operator 4-1401 for the main steam bypass valve) was listed as shut when the clearance control form required the breaker to be open.

- c. Section 8.6.2 of AP-0103.4 requires Nuclear Operators executing a clearance to perform each tagging step, in order, as itemized on the clearance order form.

8412280385 841113  
PDR ADOCK 05000250  
Q PDR

Contrary to the above, as of March 27, 1984, clearance #3-235 was not properly executed by a Nuclear Operator because tag #1 and tag #2 were hung on valves other than those specified on the clearance order form.

These examples together are a Severity Level IV violation (Supplement I).

2. TS 4.7 requires testing of the emergency containment filter system and the control room ventilation system to verify that these systems and their components will be able to perform this design functions.

Operating Procedures (OP) - 4704.3 and 10304.1 were established to implement the requirements of TS 4.7 for HEPA and charcoal filter testing on the Emergency Containment Filter System and the Control Room Ventilation System.

Contrary to the above, as of March 14, 1984, adequate testing of the above systems had not been completed in that:

- a. OP-4704.3 utilizes a single sample point upstream of the HEPA filter, despite 1978 uniform aerosol mixture test data which Turkey Point evaluated to show this approach to be invalid.
- b. OP-10304.1 utilizes single sample points both upstream and downstream of the filter media. No uniform aerosol mixture test has been conducted on the control room ventilation system to validate use of single sample points.
- c. OP-4704.3 and 10304.1 do not specify sample injection and test point locations and methodology to ensure consistent filter system testing.

These examples together are a Severity Level IV violation (Supplement I).

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 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.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: \_\_\_\_\_

**MAY 01 1984**