

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 September 23 - October 20, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. Technical Specification (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 Sections 5.1 and 5.3 of ANSI N18.7 and Appendix A of USNRC Regulatory Guide 1.33.

Section 9 of Appendix A of USNRC Regulatory Guide 1.33 recommends that maintenance that can affect the performance of safety-related equipment should be performed in accordance with written procedures, documented instructions or drawings appropriate to the circumstances.

Contrary to the above, as of October 10, 1984, adequate maintenance procedures or instructions had not been established in that:

- a. Component Cooling Water heat exchangers were drained and subsequently filled without benefit of procedures or instructions.
- b. Component Cooling Water heat exchangers were hydro-blast cleaned without benefit of procedures or instructions.
- c. Leaking Component Cooling Water heat exchanger tubes were plugged and subsequently leak tested without benefit of procedures or instructions.
- d. General leakage testing was accomplished on Component Cooling Water heat exchangers without benefit of procedures or instructions.
- e. Unit 4 intake cooling water basket strainers were cleaned without benefit of procedures and/or instructions.

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

2. TS 6.8.3 requires that temporary changes to the procedures required by TS 6.8.1 only be made provided:
  - a. The intent of the original procedure is not altered.
  - b. The change is approved by two members of the plant management staff, at least one of whom holds a senior operators' license on the unit affected.

- c. The change is documented, reviewed by the Plant Nuclear Safety Committee (PNSC), and approved by the Plant Manager-Nuclear within 14 days of implementation.

Contrary to the above, on October 2, 1984, several steps were deleted from Maintenance Procedure (MP) 3207.2, "Residual Heat Removal Pump - Disassembly, Repair, Seal Replacement and Assembly." The deletions constituted a temporary change to a procedure required by TS 6.8.1 which was not:

- a. Approved by two members of the plant management staff.
- b. Reviewed by the PNSC and approved by the Plant Manager-Nuclear within 14 days of implementation.

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

3. 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 Sections 5.1 and 5.3 of ANSI N18.7 and Appendix A of USNRC Regulatory Guide 1.33.

Section 5.1.6 of ANSI N18.7 requires and Section 9 of Appendix A of Regulatory Guide 1.33 recommends that maintenance that can affect the performance of safety-related equipment be performed in accordance with written procedures, documented instructions, or appropriate drawings.

Contrary to the above, between October 1 and October 4, 1984, written procedures were not implemented during the repair of the 4B residual heat removal (RHR) pump in that:

- a. The requirements of on-the-spot change No. 2541 to MP 3207.2 were not incorporated into step 9.5 of the procedure.
- b. MP 0707.33, "Snubber Removal and Replacement," was not utilized to remove and replace snubbers attached to the pump.
- c. The requirements of Administrative Procedure (AP) 0190.10, "Cleaning of Nuclear Safety Related Systems and Components," were not followed in that a flange in the safety-related component cooling water supply to the RHR system was not protected from foreign material contaminants as required by Section 8.1.1.5 of the procedure.

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

4. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be prescribed by procedures, documented instructions or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures, instructions or drawings.

The licensee Quality Assurance Topical Report, Section 5.2, Revision 3 and Quality Procedures 5.1, Revision 3 and 6.6, Revision 4, implement these requirements.

Contrary to the above, between May 1984 and October 10, 1984, the licensee failed to address a condition adverse to quality by not establishing procedures, instructions or drawings describing approved methods of interfacing the Unit 4 nitrogen capping system with the Unit 4 auxiliary feedwater system.

This is a Severity Level IV violation (Supplement I). This violation applies to Unit 4 only.

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: NOV 30 1984