

AUG 27 1984

ENCLOSURE 1

NOTICE OF VIOLATION

Florida Power and Light Company
Turkey Point

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

The following violations were identified during an inspection conducted on June 10 - July 14, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. Technical Specification (TS) 1.4 states that a component is operable when it is capable of performing its intended function. TS 3.6 requires that charging pumps be operable during certain reactor conditions.

Contrary to the above, on July 3, 1984, during Unit 3 power operation, the "3A" charging pump was not capable of performing its intended function and the pump was not declared inoperable because the licensee had no operability criteria for the pumps.

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

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

Section 5.3.5.(2) of ANSI N18.7-1972, "Performance of Maintenance", states that procedures should contain enough detail to permit the maintenance work to be performed safely and expeditiously. Contrary to the above:

- a. On June 19, 1984, Maintenance Procedure (MP) 4107.7 "High Head SIS Pump Disassembly, Replacement of Rotating Element and Reassembly", failed to meet the requirements of TS 6.8.1 in that:
 - (1) MP-4107.7 did not contain sufficient detail to prevent the thrust bearings from being installed improperly.
 - (2) MP-4107.7 contained two superseded pages itemizing tolerance data which was not accurate and consequently, use of the procedure could have prevented the safe and expeditious repair of the pump.
 - (3) MP-4107.7 did not require the pump be refilled with oil.
 - (4) MP-4107.7 did not contain sufficient detail to require venting of the pump prior to operation.

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- b. Administrative Procedure (AP) 0190.10, "Cleaning of Nuclear Safety Related Systems and Components" was not properly implemented on June 19, 1984. The procedure states that all openings in nuclear safety related systems or components shall be protected from outside contaminants except when necessary to carry out required operations. During the performance of MP 4107.7 "High Head SIS Pump Disassembly, Replacement of Rotating Element and Reassembly", numerous pieces of component cooling water pipe were disassembled and left with pipe ends open to the environment and not protected against foreign material intrusion.
- c. Administrative Procedure (AP) 0103.11, "Housekeeping" was not properly implemented on June 19, 1984. The procedure establishes guidelines for the control of work activities, equipment, material and environments which affect the cleanliness of the plant site. It provides procedures for inspection and subsequent correction of unsatisfactory cleanliness conditions. Section 5.2. of AP 0103.11 requires that supervisors ensure and verify that areas under their cognizance are maintained in a clean condition and directs supervisors to ensure corrective actions are initiated to resolve unsatisfactory conditions. Section 8.5.1 of AP 0103.11 requires that following the completion of a work activity, or at the end of each work shift, whichever is sooner, all waste, debris, scraps and rags resulting from the activity shall be removed and equipment used shall be properly stored.

As of June 18, 1984, Section 5.2 of AP 0103.11 had not been properly implemented in that a supervisor failed to initiate any corrective action after discovering unsatisfactory cleanliness conditions in the Unit 4 Residual Heat Removal Pump Room. In addition, on or before June 18, 1984, Section 8.5.1 of AP 0103.11 was not implemented in that waste and debris, generated during a previous work activity in the Residual Heat Removal Pump rooms for Unit 3 and Unit 4, were not removed following completion of the work activity. Equipment used during the activity was not properly stored upon completion of the activity.

These items collectively constitute a Severity Level IV violation (Supplement I).

3. 10 CFR 50, Appendix B, Criterion X as implemented by FP&L Topical Quality Assurance Report Rev. 6; TQR 10.0 "Inspection"; Quality Procedure 10.3 Rev. 5 "Inspection and Surveillance of Maintenance Activities Operations and Fuel Handling" and AP 0190.19, "Control of Maintenance on Nuclear Safety Related and Fire Protection Systems," requires in AP 0190.19 Appendix "A" that Quality Control (QC) holdpoints shall be included in maintenance procedures so that QC inspectors can witness and verify critical measurements and adjustments on Nuclear Safety Related systems and components in circumstances where such adjustments or measure cannot be verified subsequent to completion of the repair.

Contrary to the above, QC holdpoints for several procedural steps which deal with critical measurements and adjustments were not established in MP 4107.7, "High Head SIS Pump Disassembly, Replacement of Rotating Element and Reassembly."

This is a Severity Level IV violation (Supplement I)

4. Technical Specification (TS) 4.1 specifies equipment and sampling that shall be conducted as specified in Table 4.1-2. Item 1.(h).(2) of Table 4.1-2 specifies that an isotopic analysis for Iodine sample shall be obtained between 2 and 6 hours following a thermal power change exceeding 15 percent of the rated power within a one hour period.

Contrary to the above, on May 13, 1984, an isotopic analysis for Iodine sample was not obtained between 2 and 6 hours following a thermal power change exceeding 15 percent of the rated power within a one hour period.

This is a Severity Level V 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: AUG 27 1984