

OCT 19 1984

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 August 17 - September 27, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 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 Section 5.1 and 5.3 of ANSI N18.72 and Appendix A of USNRC Regulatory Guide 1.33.

Off Normal Operating Procedure (ONOP) 0208.1, "Shutdown Resulting From Reactor Trip on Turbine Trip," in Appendix A, requires that the time delay between reactor trip relay dropout and reactor trip breaker opening be no more than 100 milliseconds. Times in excess of this amount require evaluation.

Contrary to the above, on September 20, 1984, while performing ONOP 0208.1 following a Unit 4 trip, the licensee failed to identify that the time interval between relay dropout and reactor trip breaker 4B opening exceeded 100 milliseconds. Consequently, the required analysis of the significance of the information was not performed prior to returning the reactor to power operation.

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 Section 5.1 and 5.3 of ANSI N18.72 and Appendix A of USNRC Regulatory Guide 1.33.

ANSI N18.72 requires that adequate startup procedures shall be provided that include starting the reactor from cold or hot shutdown conditions and establishing power operation.

Section 2 of Appendix A of USNRC Regulatory Guide 1.33 recommends that instructions for changing modes of operation should be established covering the transition from hot standby to minimum load during nuclear startup.

Contrary to the above, as of August 23, 1984, adequate startup procedures had not been established in that:

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- a. Operating Procedure (OP) 1009.1, "Estimated Critical Conditions," could not be used to accurately estimate the point of reactor criticality except under extremely limited circumstances.
- b. The inverse count rate data and plot sheet attached to OP-0202.2 "Unit Startup-Hot Shutdown to Power Operation," lacked specified precautions and implementation instructions, the absence of which precluded its use to accurately monitor the approach to reactor criticality.

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

3. The facility operating license requires the licensee to originate and maintain facility operating records in accordance with the requirements of the Technical Specifications.

Technical Specification 6.10.1 requires records and logs of facility operation to be retained for at least five years.

Contrary to the above, prior to August 1984, the licensee did not retain graphs and charts from the Plant Curve Book which constitute records of facility operating parameters.

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: **OCT 19 1984**