

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8810070260 DOC.DATE: 88/09/30 NOTARIZED: NO DOCKET #  
 FACIL:50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251  
 AUTH.NAME AUTHOR AFFILIATION  
 CONWAY,W.F. Florida Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
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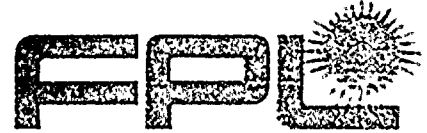
SUBJECT: Responds to violations noted in Insp Repts 50-250/88-18 &  
 50-251/88-18. Corrective actions: operators counselled.

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## NOTES:

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SEPTEMBER 30 1988

L-88-433

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Reply to Notice of Violation  
Inspection Report 88-18

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

Very truly yours,

  
W. F. Conway  
Senior Vice President - Nuclear

WFC/SDF/gp

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator,  
Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

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PDR ADDCK 05000250  
Q PNU

TEO/  
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## ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4  
DOCKET NO. 50-250, 50-251  
IE INSPECTION REPORT 250-88-18 & 251-88-18

### FINDING:

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

Regulatory Guide 1.33, Appendix A, item 1.h, specifies that procedures should be developed for log entries. Section 5.1.2 of ANSI N18.7-1972 specifies that procedures shall be followed.

Operational Surveillance Procedure (OSP) 201.1, entitled RCO (Reactor Control Operator) Daily Logs, Attachment 1, Item 73, Control Rod Positions, specifies that if a difference of greater than 12 steps between any two rod position indicators (RPIs) in a bank exists, then refer to ONOP-028, entitled Reactor Control System Malfunction.

Contrary to the above, on July 16, 1988, the Unit 3 day shift RCO failed to refer to ONOP-028 with rod G-5, Control Bank A, indicating greater than 12 steps misaligned with other rods in the bank.

### RESPONSE:

- 1) FPL concurs with the finding.
- 2) The cause for this violation was personnel error in that both the person taking the RPI readings and the Senior Reactor Operator reviewing the logs at the end of the shift failed to recognize that a greater than 12 step discrepancy existed between the highest and lowest RPI in a bank.
- 3) The discrepancy was noted on the following shift while the RCO was taking RPI readings. Since the RPI readings were discrepant for greater than 8 hours, an immediate load reduction was commenced in accordance with 3-ONOP-028, Reactor Control System Malfunction. The reactor engineering group performed a flux map shortly thereafter and determined the control rod to be in the correct position. The instrumentation and controls department calibrated the RPI and load was returned to 100% power.

- 4)
  - a) Counseling was held with those operators failing to note the discrepant RPI condition. The issue of inadequate review of operator logs was also discussed with these personnel.
  - b) A shift information book entry was made to have this issue discussed at shift briefings, along with the issue of inadequate log reviews.
  - c) The RCO logs will be revised to require comparison of the RPIs to the step counters, and to calculate the difference between the two.
- 5)
  - a) Full compliance with 4(a) above was achieved by August 23, 1988.
  - b) Full compliance with 4(b) above was achieved by August 25, 1988.
  - c) Full compliance with 4(c) above will be achieved by September 30, 1988.