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CESSION NBR:8811020408 DOC.DATE: 88/10/24 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

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 RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to violations noted in Insp Repts 50-250/88-21 & 50-251/88-21.

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FPL

OCTOBER 24 1988

L-88-465

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 88-21

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: Malcolm L. Ernst, Acting Regional Administrator,
Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

8811020408 881024
PDR ADCK 05000250
Q PDC


an FPL Group company



ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NO. 50-250, 50-251
IE INSPECTION REPORT 250-88-21 & 251-88-21

FINDING:

TS 6.8.1 states, in part, that written procedures that meet or exceed the requirements of Appendix A, of Regulatory Guide 1.33, shall be established, implemented and maintained. Appendix A, of Regulatory Guide 1.33, recommends surveillance procedures for reactor protection system tests.

Operating Procedure 14004.1, Steam Generator Protection Channel - Periodic Test, dated February 2, 1988, section 8.3.2, requires verification that the steam generator B steam flow control transfer switch and feedwater flow control transfer switch be placed on channel IV.

Contrary to the above, on August 19, 1988, while performing section 8.3 of OP 14004.1, the steam generator B steam flow control transfer switch and feedwater flow control transfer switch were inadvertently placed on channel III, resulting in a reactor scram on steam generator B low-low water level.

RESPONSE:

- 1) FPL concurs with the finding..
- 2) The reason for the violation was cognitive personnel error in that the reactor operator performing operating procedure 14004.1 selected the wrong channel of steam flow input to the "B" feedwater regulating valve circuitry.
- 3) A. An event response team met to determine the root cause and corrective actions appropriate for the event. The root cause and corrective actions were identified by August 21, 1988.

B. The operator involved was counseled on compliance with procedures on August 22, 1988.
- 4) A. Load threatening procedures of this nature which are performed periodically during which incorrect channel selection could place the unit in a transient, will have the channel selections independently verified by a qualified operator.

B. Identification labeling of the subject equipment will be modified to reflect protection channel numbers.
- 5) The independent verifications described in item 4A will be included in the appropriate procedures by January 3, 1989.

The identification labeling changes described in item 4B will be completed by November 1, 1988.

