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SUBJECT: Responds to violations noted in Insp Repts 50-250/88-30 & 50-251/88-30.

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DECEMBER 19 1988

L-88-536

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 88-30

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/RHF/gp

Attachment

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

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PDR ADOCK 05000250
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ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250 AND 50-251
IE INSPECTION REPORT 250-88-30 & 251-88-30

FINDING A

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 of ANSI N18-7-1972. ANSI N18-7-1972, Section 5.1.2 specifies that procedures shall be followed.

Administrative Procedure 0109.1, Preparation, Revision, Approval, and Use of Procedures, revision dated, September 8, 1988, Section 8.2.2, specifies: If a procedure step cannot be completed as written or if in the judgement of the individual performing a procedure, completion of a specific step could result in an unsafe condition, conduct of the procedure shall be stopped, the system/components placed in a safe condition and the Plant Supervisor-Nuclear (PS-N) shall be notified. The required corrective actions shall be determined by the PS-N.

Contrary to the above, on October 15, 1988, the Unit 4 RCO did not consult the PS-N when he could not perform a makeup with normal blend due to primary water being isolated to the blender. Instead, the RCO attempted to makeup using solely boric acid using section 8.8 of AP 0103.32, Cold Shutdown Conditions, dated September 22, 1988. The intent of section 8.8 was not to provide steps for makeup and as a result the charging pump discharge line became momentarily clogged.

RESPONSE:

- 1) Florida Power and Light accepts the violation.
- 2) The reason for the violation is personnel error. After the RCO could not find an applicable procedure for raising the reactor cavity level, he decided on his own (rather than consulting with the PSN) to raise the cavity level with the boric acid flow path from the Boric Acid Storage Tank through the Boric Acid Transfer Pumps to the Charging Pump suction, with discharge to the reactor, as specified in AP 0103.32. The Charging Pump was not running during this evolution. This flowpath was not intended to provide makeup to the reactor cavity.
- 3) Upon recognizing the absence of flow, the charging pump was started and the line was cleared.
- 4) a) The subject RCO was counseled concerning the appropriateness of his actions.



- b) Procedure 3/4-OP-201 will be revised to add an infrequent operation to raise reactor cavity level. This change will add a provision to lift the clearance on primary water for normal blend and also provide a method to fill the reactor cavity from the Refueling Water Storage Tank.
 - c) This event will be covered by the Training Department during the next operator requalification cycle.
- 5) a) Corrective action 3 was completed on October 15, 1988.
- b) Corrective action 4a was completed by December 13, 1988.
 - c) Corrective action 4b will be completed by January 3, 1989.
 - d) Corrective action 4c will be completed by the end of the next operator requalification cycle, which is presently scheduled to end on February 14, 1989. FPL will give prior notification to the Commission if the currently scheduled end date is required to be extended by more than 30 days.

FINDING B

Administrative Procedure (ADM) 021, Technical Specification Implementation (TSI) Procedure, revision dated September 29, 1988, Section 3.1, requires that the requirements of the Interim Technical Specifications (ITS) be complied with unless the requirements are waived in accordance with the procedure or are less restrictive than existing TS. ITS 3/4 9.2 requires, in Mode 6, that an audible neutron flux monitor be OPERABLE in the control room and containment.

Contrary to the above, on October 13, 1988, with Unit 4 in Mode 6, the audible neutron flux monitor in the control room was silenced by operations personnel. Although this requirement was more restrictive than existing TS, the operators did not obtain a waiver.

RESPONSE:

- 1) Florida Power and Light accepts the violation.
- 2) The reason for the violation is personnel error. Contributing to the personnel error was a procedure weakness, in that normal operating procedures required an audible neutron source monitor in the control room with the plant in Mode 6 only during core alterations.
- 3) Upon the situation being identified, the audible neutron source monitor in the control room was activated.
- 4) a) Procedure 3/4-OSP-201.1, RCO Daily Logs, was revised to require an operable audible neutron source monitor with a unit in Mode 6.



b) This event will be covered by the Training Department during the next operator requalification cycle.

5) a) Corrective action 3 was completed on October 15, 1988.

b) Corrective action 4a was completed by November 19, 1988.

c) Corrective action 4b will be completed by the end of the next operator requalification cycle, which is presently scheduled to end on February 14, 1989. FPL will give prior notification to the Commission if the currently scheduled end date is required to be extended by more than 30 days.

