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 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
 GOLDBERG, J. H. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Response to violations noted during Insp Repts 50-250/90-04
 & 50-251/90-04. Corrective actions noted.

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APR 13 1990

L-90-134

10 CFR 2.201

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 90-04

Florida Power & Light Company has reviewed the subject inspection report and pursuant to 10 CFR 2.201 the response is attached.

Very truly yours,

J. H. Goldberg
Executive Vice President
Nuclear Energy

JHG/GRM/sh

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

9004200416 900413
PDR ADOCK 05000250
Q PNU



ATTACHMENT

RE: Turkey Point Units 3 and 4
Docket Numbers 50-250 and 50-251
NRC Inspection Report 90-004

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 Sections 5.1 of ANSI N18.7-1972. Section 5.1.2 of ANSI N18.7-1972 requires that procedures be followed.

Operating Procedure 4-OP-013, Instrument Air System, dated December 15, 1989, Section 3.0, Prerequisites, required that all instruments and control devices be in service for the instrument air system operation with no clearances that could affect system operability. This is verified by reviewing the clearance log.

Contrary to the above, on February 4, 1990, a senior nuclear plant operator returned the Unit 4 instrument air dryer to service per 4-OP-013 without verifying system clearances. This resulted in the Unit 4 instrument air supply being isolated. The control room operators were required to reduce the load to prevent a reactor trip until the instrument air was restored.

RESPONSE

1. FPL concurs with the finding.
2. The Unit 4 instrument air supply was inadvertently isolated due to personnel error. A Senior Nuclear Plant Operator (SNPO) was instructed to place the Unit 4 instrument air dryer in service. The SNPO obtained a copy of Operations Procedure 4-OP-013, "Instrument Air System," and the clearance order (4-90-02-008) issued to remove the Unit 4 instrument air dryer from service. The SNPO assumed that the clearance order followed the procedural sequence for restoring the Unit 4 instrument air dryer to service. Based on this, the SNPO commenced performance of Section 7.5 of 4-OP-013 while simultaneously removing tags identified on the clearance order. Upon closure of the Unit 3 instrument air cross-tie isolation valve to Unit 4 (3-IAS-012), instrument air to Unit 4 was lost.

The SNPO did not adhere to the prerequisites of 4-OP-013 which require that all instruments and control devices be in service for Instrument Air System operation. This prerequisite requires that clearances be lifted before using the procedure.

The SNPO did not adhere to the clearance executor responsibilities defined in Administrative Procedure AP 0103.4, "In-Plant Clearance Orders." The clearance executor is responsible for following the clearance tag-out and/or tag removal in the order given. If any step cannot be executed exactly in the order given, he shall request clarification from the originator of the order or Plant Supervisor-Nuclear before proceeding. Clearance Order 4-90-02-008 was correctly prepared. The last step in the clearance order required the Unit 4 instrument air dryer to be placed in service in accordance with Section 7.5 of 4-OP-013. Had the SNPO followed the clearance order, this event would not have occurred.

3. Corrective steps which have been taken and the results achieved include:
 - a. The Operations Superintendent held a meeting with the individuals involved in this event to determine the cause for inadvertently isolating the Unit 4 instrument air supply. During this meeting, the involved individuals were counseled on their performance, the need to thoroughly understand the task being assigned, and the importance of following procedural requirements.
 - b. The Operations Superintendent discussed this event with operations personnel during shift crew meetings. Shift crew meetings provide a forum for Turkey Point management team personnel to interface with operations personnel and discuss problems affecting plant operations.
4. Corrective steps which have or will be taken to avoid further violations include:
 - a. A Human Performance Evaluation System (HPES) representative is currently evaluating this event for possible enhancements to prevent event recurrence.
 - b. Operations management will review the HPES Study recommendations to determine what further actions, if any, need to be taken to prevent event recurrence.
5. The date when full compliance was or will be achieved:
 - a. Item 3.a was completed on February 7, 1990.
 - b. Item 3.b was completed on March 20, 1990.
 - c. Item 4.a will be completed by April 16, 1990.
 - d. Item 4.b will be completed by April 27, 1990.