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ACCESSION NBR: 9112270131 DOC. DATE: 91/12/18 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  
 GOLDBERG, J.H. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC ltr re violations noted in Insp Repts  
 50-250/91-42 & 50-251/91-42. Corrective actions: reactor power  
 was reduced below 90 percent & indicated axial flux was  
 returned to within target band on 911018.

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FPL

P.O. Box 14000, Juno Beach, FL 33408-0420

DEC 18 1991

L-91-329  
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 No. 50-250 and 50-251  
Reply to Notice of Violation  
NRC Inspection Report 91-42

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

If there are any questions please contact us.

Very truly yours,

J. H. Goldberg  
President  
Nuclear Division

JHG/CLM/cm

Attachment

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

9112270151 911218  
PDR ADOCK 05000250  
Q PDR

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ATTACHMENT

REPLY TO A NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
NRC Inspection Report 91-42

FINDING

"Technical Specification (TS) 3.2.1 requires that the indicated axial flux difference (AFD) be maintained within a  $\pm 5\%$  target band (flux difference units) about the target flux difference. TS 3.2.1 action statement a. requires that, with the indicated AFD outside of the above required target band and with thermal power greater than or equal to 90% of rated thermal power, within 15 minutes either: 1) restore the indicated AFD to within the target band limits, or 2) reduce thermal power to less than 90% of rated thermal power.

Contrary to the above, on October 18, 1991, during the performance of OP 12304.8, Inducing Xenon Oscillations to Produce Various Incore Axial Offsets, the indicated AFD was allowed to deviate outside the  $\pm 5\%$  target band for approximately two hours with Unit 3 at 100% power.

This is a Severity Level IV violation (Supplement 1)."

RESPONSE TO FINDING

1. FPL concurs with the finding.
2. This event was caused by a procedure that was not adequately reviewed to reflect the revised TS, and by an error that was discovered in the plant TS.

TS 3.2.1 has a footnote that incorrectly references TS 3.2.1, Action statement b(2); the footnote states that, "A total of 16 hours operation may be accumulated with the AFD outside of the above required target band during testing without penalty deviation." This same footnote is referenced to the correct applicability statement in the January 9, 1991, draft edition of NUREG-1431, Westinghouse Owner's Group Methodically Engineered, Restructured, and Improved TS (MERITS).



The Turkey Point TS were revised to reflect the standard TS format August 28, 1990. The previous TS and the governing procedure for the calibration, OP-12304.8, allowed operation outside of the axial flux target values while inducing xenon oscillations to perform the incore/excore calibration. Operation outside the target band had been a standard practice at Turkey Point, to acquire accurate data for calibration of the high flux trip setpoint. This practice led the reviewers to believe that the procedure accurately reflected the revised TS as well. As a result of that belief, despite considerable discussion of that particular TS by the personnel tasked with implementation of the revised TS, the disparity between the TS and the procedure was not identified.

3. Corrective steps which have been taken and the results achieved:

- a. Reactor power was reduced below 90 percent and the indicated axial flux value was returned to within the target band on October 18, 1991, at 0150 EDT (Reference LER 250-91-009-00).
- b. A temporary waiver of compliance was issued on October 31, 1991, allowing Turkey Point a total of 16 hours operation at less than 90% power outside the target band, during testing, without penalty.
- c. A TS amendment request was submitted on October 31, 1991, (FP&L Letter No. L-91-301) to correct the TS error.
- d. Procedure OP 12304.8 was revised to require performance of the procedure at a power level less than or equal to 90%. OP 12304.8 has since been replaced by O-OP-059.3, which contains the same restriction.
- e. The procedures implementing TS 3.2.1 were subsequently reviewed by an independent consultant to ensure they accurately reflect the requirements in the Technical Specifications.

4. Corrective actions which will be taken to avoid further violations include:

No additional corrective actions are deemed necessary to preclude recurrence of this event.

5. The date full compliance will be achieved:

Reply to NOV 91-42  
Page 3 of 3

Full compliance was achieved on October 18, 1991, when reactor power was reduced below 90 percent and the indicated axial flux value was returned to within the target band.

