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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
 OLDBERG, J.H. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Repts 50-250/91-52 &
 50-251/91-52. Corrective actions: PORV PCV-3-455C closed &
 RCS pressure recovered & night order issued instructing
 personnel to conduct preevolution briefings.

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FPL

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

MAR 19 1992

L-92-67
10 CFR 2.201

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

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Reply to Notice of Violation
NRC Inspection Report 91-52

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/OIH/oh

Attachment

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

700053

9203230238 920319
PDR ADDCK 05000250
Q PDR

cc: Mr. Stewart Ebnetter

Handwritten initials and marks:
AAB 11
IEO 11



ATTACHMENT

REPLY TO A NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
NRC Inspection Report 91-52

FINDING:

"Technical Specification 6.8.1 requires that written procedures and administrative policies be established, implemented, and maintained in accordance with the requirements and recommendations of Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978, recommends that written procedures be established for typical safety-related activities carried out during the operation of nuclear power plants. Section 1.b of this Appendix recommends administrative procedures which include authorities and responsibilities for safe operation and shutdown.

Paragraph 5.6.16.1 of procedure 0-ADM-200, Conduct of Operations, requires that evolution briefings be conducted for individuals involved in an evolution that is to be performed and that the detail of the briefing is dependent on the degree and complexity of the evolution and the number of individuals involved.

Contrary to the above, on January 14, 1992, an adequate evolution briefing was not conducted prior to the investigation of a possible malfunction of the pressurizer control group heaters with Unit 3 at 100% power. As a result, power operated relief valve PCV-3-455C was inadvertently cycled due to excessive demand on controller PC-3-444J.

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

RESPONSE TO FINDING

1. FPL concurs with the finding.

2. Cause of the violation:

The root cause was that a pre-evolution briefing was not conducted to ensure that personnel understood the control functions of PC-444J and precaution to be taken during manual pressure control. The second contributor was the lack of procedural guidance cautioning operators that increasing PC-444J demand signal will open PCV-3-455C.

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

a. PCV-3-455C was closed and Reactor Coolant System (RCS) pressure was recovered.

b. A night order was issued instructing personnel to conduct pre-evolution briefings.

c. Disciplinary action was administered to the personnel involved.

4. Corrective actions which have been taken to avoid further violations include:

Procedures associated with pressurizer pressure control were reviewed. This review identified required procedure changes to 3/4-OSP-041.23, cautioning personnel that PC-444J can open PORVs.

5. Full compliance and completion of all corrective actions was achieved on January 17, 1992.

