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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

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RECIP.NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 920526 ltr re violations noted in insp rept
 50-250/92-07 & 50-251/92-07. Corrective actions: night order
 issued to all personnel & four personnel involved were
 disciplined.

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FPL

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

MAY 26 1992

L-92-147
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
NRC Inspection Report 92-07

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/JEK/jk

Attachment

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

9205290306 920526
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 92-07

FINDING

TS 6.8.1 requires that written procedures be established, implemented, and maintained covering activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Section 1.c of Regulatory Guide 1.33, Revision 2, Appendix A, February 1978, recommends administrative procedures for equipment control (e.g., locking and tagging).

Paragraph 5.15.5 of procedure 0-ADM-212, Inplant Equipment Clearance Orders, requires that the clearance controller/holder shall request a Release for Test and shall provide, among other things, the reason for the Release for Test listing the test to be performed and a step-by-step description of what clearance order steps need to be included on the Release for Test and the position required for the test release. In addition, paragraph 5.15.12 requires that the administrative Reactor Control Operator or qualified operator research and write a Release for Test. Paragraph 5.15.13 also requires the Assistant Nuclear Plant Supervisor/Nuclear Watch Engineer to independently review and verify the adequacy of the administrative Reactor Control Operator's instructions and steps including the releasing order and the component positions.

Contrary to the above, on February 23, 1992, 4B charging pump vent valve 4-276E was not included on a Release for Test and was allowed to remain open while the system was pressurized to approximately 2500 psig from the 4A charging pump discharge header. This in turn permitted the inadvertent release of approximately 80 gallons of primary coolant which contaminated two licensed operators and the Unit 4 charging pump room.

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



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RESPONSE TO FINDING

1. FPL concurs with the finding.
2. Cause of the violation:

The root cause of the violation is personnel error.. Site personnel failed to include valve 4-276E on the clearance test release in the closed configuration and the personnel performing the evolution failed to adequately check the 4B charging pump clearance and understand the evolution being performed.

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

1. Valve 4-276E was immediately closed upon discovery of the leak. The valve closure isolated the leak.

2. The contaminated personnel and the Unit 4 charging room were decontaminated.

3. The four personnel directly involved were disciplined. This discipline was intended to reinforce the expected standards of work performance at Turkey Point.

4. The corrective steps taken to avoid further violations:

1. A night order was issued to all operations personnel discussing the event.

2. The event and its causes were discussed in Operations Department meetings.

5. The date when full compliance was achieved:

The night order, item 4.1, was issued on February 24, 1992.

The discussions about item 4.2, with Operations Department personnel, were held on or before March 31, 1992.

Full compliance was achieved on March 31, 1992.