

ACCELERATED DOCUMENT DISTRIBUTION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9303220200 DOC. DATE: 93/03/15 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
 50-250/93-01 & 50-251/93-01. Corrective actions: non-licensed
 operator requalification classes will be involved in
 scenarios w/ Licensed Operators beginning in Mar 1993.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-2 PD	1 1	RAGHAVAN, L	1 1
INTERNAL:	AEOD	1 1	AEOD/DEIB	1 1
	AEOD/DSP/TPAB	1 1	AEOD/TTC	1 1
	DEDRO	1 1	NRR/DORS/OEAB	1 1
	NRR/DRCH/HHFBPT	1 1	NRR/DRIL/RPEB	1 1
	NRR/DRSS/PEPB	1 1	NRR/PMAS/ILPB1	1 1
	NRR/PMAS/ILPB2	1 1	NUDOCS-ABSTRACT	1 1
	OE DIR	1 1	OGC/HDS3	1 1
	<u>REG FILE</u> 02	1 1	RES MORISSEAU, D	1 1
	RGN2 FILE 01	1 1		
EXTERNAL:	EG&G/BRYCE, J.H.	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 22 ENCL 22





MAR 15 1993

L-93-064
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 93-01

Florida Power & 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

220C58

9303220200 930315
PDR ADDCK 05000250
Q PDR



ATTACHMENT

REPLY TO A NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
NRC Inspection Report 93-01

FINDING:

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, revision 2, February 1978, which include: administrative procedures for authorities and responsibilities for safe operation and shutdown, and operating procedures for going from Hot Shutdown to Cold Shutdown.

Administrative procedure 0-ADM-200, Conduct of Operations, paragraph 5.6.20, states that communications to operating personnel must be clear and concise. These directions shall be given in such a manner that they are explicit and understandable. This should be verified for complex orders and those orders that include numbers by having the operator repeat them back or by providing written direction so that the director is satisfied that the orders are understood. Upon completion of the directed evolution, the operator shall report back to the controlling station the exact action that he/she has taken.

Contrary to the above, at approximately 5:00 a.m. on January 16, 1993, with the reactor coolant temperature at approximately 350 degrees F, the reactor control operator failed to follow Administrative Procedure 0-ADM-200 when he directed the senior nuclear plant operator to accomplish the highlighted portions of Attachment 1 to procedure 3-GOP-305, Hot Standby to Cold Shutdown. No explicit directions were provided and no report back of the exact action taken was accomplished, resulting in the inadvertent isolation of the containment spray system prior to reactor coolant temperature being less than 200 degrees F.

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



RESPONSE TO FINDING

1. Florida Power & Light Company (FPL) concurs with the finding.
2. Reason for the violation:

The licensed Reactor Control Operator (RCO) controlling the evolution of cooling down Unit 3 made two highlighted copies of Attachment 1 to general operating procedure 3-GOP-305, Hot Standby To Cold Shutdown. The highlighted areas of the procedure attachment included valve isolations to be accomplished during the cooldown process from Mode 3 to Mode 5. The highlighted attachments were given to the non-licensed Turbine Operator and Nuclear Operator responsible for the actual manipulation of valves in the plant. The RCO stated that he intended to discuss each step in detail with the Turbine Operator and Nuclear Operator as the cooldown progressed. While the plant was being cooled down from 380°F to 350°F, the communications between the RCO and the field personnel were not conducted in a formal manner. This lack of formal communications resulted in the containment spray pumps' discharge valves being isolated prematurely while in Mode 4.

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

The plant conditions had changed to Mode 5 prior to discovery of the containment spray pumps' discharge valves isolation. Operability of the containment spray pumps is not required in Mode 5. No further immediate corrective action was necessary.

4. The corrective steps which have been taken to avoid further violations:
 - a. The Turkey Point Plant General Manager met with each Operations shift and discussed the event, the need for more formal communications in all tasks (such as the repeat back concept) and the other corrective actions listed in this Response.
 - b. Senior members of the Operations management were placed on shift to monitor the conduct of operations during the shutdown and the subsequent startup.
 - c. A night order about communications and proper procedure use was issued.

- d. An on the spot change (revision) to general operating procedure 3-GOP-305 was issued providing for mode dependent attachments. Revisions to the comparable Unit 4 procedure were also completed.
 - e. The Reactor Control Operator has been disciplined in accordance with FPL Nuclear Division Policy.
 - f. A revision to operations support procedure 0-OSP-201.2, SNPO Daily Logs, has been completed. This change requires the personnel filling out the log to include a note explaining why a piece of equipment is out of service and why it is acceptable for that plant condition.
 - g. Administrative procedure 0-ADM-205, Administrative Control of Valves, Locks and Switches, has been revised. The revision requires the Nuclear Plant Supervisor and/or the Assistant Nuclear Plant Supervisor to evaluate procedure and mode requirements prior to issuing a key for safety related equipment and components.
 - h. A human performance evaluation has been performed on this event. Corrective actions identified by this evaluation are included in corrective actions discussed in this Response to the Notice of Violation.
 - i. A training brief has been issued to appropriate plant personnel on the importance of formal communications.
 - j. Administrative Procedure 0-ADM-202, Shift Relief and Turnover, has been revised to include the conduct of shift turnover briefings using an operator aid which lists required equipment. The procedure provides for the discussion of equipment required, equipment available and equipment planned to be removed from service. The procedure also provides for the specification of conditions which must be satisfied prior to removal of Technical Specification required equipment from service.
5. Corrective actions which will be taken to prevent further violations:
- a. The Non-licensed Operator (NLO) Regualification classes will be involved in scenarios with Licensed Operators beginning in March 1993. These training sessions will stress the importance of improved communications between NLOs and control room personnel. These training sessions are expected to establish a better



knowledge level for the NLOs in the areas of Emergency Operating Procedures, as well as integrated operation of safety related systems.

- b. FPL Quality Assurance personnel have been requested to include adequate communications as an additional performance criterion in their plant monitoring program.

6. The date when full compliance was achieved:

Turkey Point Unit 3 entered Mode 5 (less than 200°F) at 1815 on January 16, 1993. The containment spray system is not required to be operable in Mode 5. Full compliance was achieved at that time.

