

CATEGORY 1

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

SUBJECT: Responds to violations noted in insp repts 50-250/96-04 & 50-251/96-04. Corrective actions: issued night order re importance of procedural compliance & removed two operations personnel from shift for remedial training.

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FPL

JUL 1 1996

L-96-154
10 CFR 2.201

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

Gentlemen:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250/251
Reply to Notice of Violation
NRC Inspection Report 96-04

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,

R. J. Hovey
Vice President
Turkey Point Plant

JEK

Attachment

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

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REPLY TO NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
NRC Inspection Report 96-04

FINDING

"During an NRC inspection conducted on March 24 through May 4, 1996, a violation of NRC requirements was identified. In accordance with "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

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

Item 3.n of Regulatory Guide 1.33, Revision 2, February 1978, Appendix A, recommends the use of procedures for activities involving the Chemical and Volume Control System (CVCS).

Procedure 0-OP-046, Chemical and Volume Control System - Boron Concentration Control, section 5.3, Dilution, requires the operator to select either dilute or alternate dilute methods for sending pure water to the blender

Contrary to the above, on March 26, 1996, the Unit 3 RCO failed to adequately implement section 5.3 of procedure 0-OP-046, as neither dilute nor alternate dilute method was selected for sending pure water to the blender. Instead, the RCO opened the respective blender inlet and outlet valves.

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

RESPONSE TO FINDING

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

This evolution is normally performed from memory, as is allowed by administrative procedures controlling frequent evolutions. The operator in this case attempted to perform the boration and a subsequent manual flush operation from memory. However, the manual flush operation was no longer part of the procedure. 0-OP-046, CVCS Boron Concentration Control had been changed to delete the blender flush in 1991 as a result of the lowering of boric acid concentration requirements in the chemical volume and control system (CVCS). But the change to the blender operation was not effectively communicated at the time of the procedure change and Training summary sheets did not adequately indicate deletion of the flush requirement.

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

Immediate actions are as follows:

A night order was issued that stressed the importance of procedural compliance.

The two operations personnel were removed from shift for remedial training.

Additional senior reactor operators and key line managers were assigned as management on shift, 24 hours a day for 3 weeks, to capture needs for procedure enhancements and other activities requiring a procedure.

The importance of procedural compliance has been stressed by completion of the first two immediate actions.

Condition Report 96-722 was issued and completed requiring the identification of the cause of this event and the implementation of corrective actions.

Investigation of the extent of this condition has been completed. No evidence of other operators performing a manual flush has been found. Other evolutions performed from memory were investigated. Minor potential enhancements in some memorized evolution procedures were identified.

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

All licensed operators normally assigned responsibility as unit reactor control operator have been requalified on the required CVCS operations.

A shift supervisor meeting was held immediately after the event to discuss the event. Management expectations for supervisory oversight and procedural adherence during routine evolutions were reinforced.

FPL is evaluating a plan to have operators periodically perform routine evolutions (which may be performed from memory), with the procedure in hand, to ensure operators remain current with the requirements.

Those procedures identified as potential enhancement candidates, in Item 3 above, will be further reviewed and revised, as appropriate, by December 15, 1996.

5. The date when full compliance was or will be achieved:

Full compliance was completed on June 4, 1996, with the re-training of operators on the CVCS evolution.

