

# CATEGORY 1

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ACCESSION NBR: 9607250153      DOC. DATE: 96/07/18      NOTARIZED: NO      DOCKET #  
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       50-251 Turkey Point Plant, Unit 4, Florida Power and Light C      05000251  
 AUTH. NAME      AUTHOR AFFILIATION  
 PLUNKETT, T.F.      Florida Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Forwards response to NRC ltr re violations noted in insp repts 50-250/96-06 & 50-251/96-06 on 960505-0615.

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JUL 18 1996

L-96-185  
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 96-06

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,

A handwritten signature in dark ink, appearing to read 'T. F. Plunkett', is written over a horizontal line.

T. F. Plunkett  
President  
Nuclear Division

JAH

Attachment

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

9607250153 960718  
PDR ADOCK 05000250  
Q PDR



REPLY TO NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
NRC Inspection Report 96-06

FINDING

"During an NRC inspection conducted on May 5 through June 15, 1996, a violation of NRC requirements was identified. In accordance with the "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 shall be established in accordance with Appendix A of Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations), Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33 section 8.b.(1)(q) states that implementing procedures are required for each surveillance test listed in the technical specifications, including emergency power tests.

Technical Specification 4.8.1.1.2.a.4 requires that each emergency diesel generator shall be demonstrated operable by verifying that the diesel starts and accelerates to rated conditions. Once per 184 days, these conditions shall be reached within 15 seconds after the start signal from normal conditions. This requirement was implemented by procedures 3 and 4-OSP-023.1, Diesel Generator Operability Test, sections 7.3 and 7.4, rapid start test.

Contrary to the above, prior to May 21, 1996, and since initial plant startup for Unit 3 and since the Dual Unit Outage for Unit 4, the 184 day rapid start test performed by procedures 3 and 4-OSP-023.1 was not performed from normal conditions in that the diesel generator fuel priming pumps were operated prior to initiating the diesel start signal. As a result, portions of the automatic start circuitry had not been demonstrated operable. Subsequent testing of all four diesels without operating the fuel priming system was successful.

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

RESPONSE TO FINDING

1. Florida Power & Light Company (FPL) concurs with the finding.
2. On June 18, 1996, FPL submitted LER 250/96-08, Inadequate Surveillance Testing for Emergency Diesel Generators. The issues associated with violation 96-06-02, including corrective actions are contained within LER 250/96-08.