

OCT 11 1984

ENCLOSURE 1

NOTICE OF VIOLATION

Florida Power and Light Company  
Turkey Point

Docket Nos. 50-250 and 50-251  
License Nos. DPR-31 and DPR-41

The following violations were identified during an inspection conducted on July 15 - August 17, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. The Facility Operating Licenses, DPR-31 and DPR-41, Section III, state that the license is subject to 10 CFR 50.59. 10 CFR 50.59(1) requires that evaluations be conducted to determine if an unreviewed safety question exists prior to a facility change or procedure change being accomplished for any system as described in the FSAR and prior to the conduct of tests described in the FSAR. 10 CFR 50.59(2) requires that the evaluation be made against evaluations previously done in the safety analysis report.

Contrary to the above, the licensee did not require that evaluations be conducted in accordance with the provisions of 10 CFR 50.59 in that the Administrative Procedures (AP) 0190.15, 0109.1, and 0103.3 covering, respectively, Design Changes, Procedures Changes and Temporary System Alterations did not require that the evaluations be done against the entire safety analysis report but only against the Chapter 14 Accident Analysis.

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

2. Technical Specification (TS) 4.5.2.a requires that the Residual Heat Removal (RHR) and High Head Safety Injection (HHSI) pumps be started monthly, that they start and reach the required head, and that the instruments and visual observations indicate proper functioning during the test.

Contrary to the above, the pump surveillance tests, OP 4004.1 and OP 4104.1, did not verify by the instruments and visual observations that the pumps were properly functioning, in that, neither procedure verified that the seals, seal water system, or component cooling water system met design function during the test. Therefore, on August 1-2, 1984, the tests on RHR pumps on both units conducted per OP 4004.1 and the tests on the HHSI pumps conducted per OP 4104.1 during July 1984, were inadequate.

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

3. The Facility Operating Licenses, DPR-31 and DPR-41, Section III.D, require that the licensee shall originate facility operating records in accordance with the Technical Specification (TS). Technical Specification 6.10.1.d requires that records of surveillance activities required by the TS be kept for five years. 10 CFR 50, Appendix B, Criterion XVII requires that records affecting quality shall include the results of tests and that test records

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shall identify the data recorder, the reviewer, the acceptability and the action taken in connection with any deficiencies. The FP&L Quality Assurance Topical Section 17.2.1, Revision 0, and Quality Procedure 17.1, Revision 11 implements these 10 CFR 50, Appendix B requirements.

Contrary to the above, the data originated as a facility operating record of the required TS surveillance test performed on July 26, 1984, on the 'A' Emergency Diesel per OP 4304.1 did not have the information required to qualify it as a record as required by the above, in that, the Data and Record Sheets did not require the identity of the data recorder nor the acceptability and the action taken in connection with any deficiency.

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

4. Technical Specification 6.8.1 requires that written procedures and administrative policies shall be established, implemented, and maintained.
  - a. Administrative Procedure 0103.7 establishes the procedure for systems or equipment acceptance and turnover to the plant staff. It charges the startup test group with the responsibility for the walkdown of the system to identify discrepancies and to have the operating drawings updated.

Contrary to the above, AP 103.7 was not implemented in January through May 1984 during the turnover of the Pressurizer Heater Circuit Modification, PC/M 81-29 and 81-30, in that, the discrepancy of the bypass switches not being labeled was not identified and the operating drawing change to incorporate PC/M 81-30 was not accomplished.

- b. Administrative Procedure 0190.0 establishes the procedure for the control of measuring and test equipment. It requires that equipment be calibrated on a routine schedule, identified with proper calibration data affixed, and segregated and not used if out of service.

Contrary to the above, several examples of equipment with incorrect or no calibration stickers were identified. Several Ashcroft gauges had no current calibration data available and in addition, they were not segregated from calibrated equipment. One Ametek pump was used outside of its calibrated period of acceptability.

- c. Operating Procedure (OP) 0204.2 requires an operator to read Refueling Water Storage Tank (RWST) pressure, convert to gallons and record the RWST head pressure and check against tank level indicators LI-3-6583A and B. OP 0204.2 also requires that a name plate with an engraved correction factor be mounted next to the gauge.

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Contrary to the above, the calculated RWST level was not compared with level indications LI-3-6583A and B as they were out of service on Unit 3 and no facilities for additional level indications were made. In addition, there was no engraved correction factor attached to the local Ashcroft gauge.

These examples collectively constitute a Severity Level IV violation (Supplement I).

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

**OCT 11 1984**

Date: \_\_\_\_\_