

NRC RECEIVED

33 FEB 23 AIO: 41



February 17, 1983
L-83-83

Mr. James P. O'Reilly
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, GA 30303

Dear Mr. O'Reilly:

Re: RII: JRW
St. Lucie Unit 2
Docket No. 50-389/82-78⁵

Florida Power & Light Company has reviewed the subject inspection report which identified the following deviation: "Improper Storage of Safety-Related HEPA Filters." Please find attached our response to this deviation.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/RJS/JCO/njb

Attachment

A-8 @

[Faint handwritten notes at the bottom of the page]

DEVIATION

Section 6.2 of ANSI N509-1980, "Nuclear Power Plant Air Cleaning Units and Components", provides the accepted industry standard for storage of HEPA and charcoal filters and states that HEPA filters must be stacked no more than three cartons high unless intermediate bracing or flooring is provided to prevent the weight of the upper tier from bearing on the lower tier.

Contrary to the above, on December 15 approximately 240 HEPA filters were stacked five cartons high with obvious damage to lower tier cartons. No intermediate bracing or flooring was provided. A similar deviation was brought to your attention during Region II inspection 50-335/78-10 in April, 1978.

RESPONSE

FP&L agrees with the above deviation. The HEPA filters were not stored in accordance with ANSI N509-1980 because the purchase order (422595) did not specify that the storage requirements would be per the ANSI standard.

Immediately following the inspection, the HEPA filters were restacked three cartons high, in addition all filters inside of cartons which evidenced obvious damage were inspected and were found undamaged. All HEPA filters are now stored in accordance with ANSI N509-1980 and all cartons are physically marked "DO NOT STACK MORE THAN THREE HIGH".

To ensure continued compliance with the ANSI Standard, the purchase order will in future specify ANSI N509-1980 as the specification for storage requirements of HEPA filters.

In addition, Site Quality Procedure (SOP)-3 "Material Control" will be revised to include the ANSI Specification.

Full compliance will be achieved by March 31, 1983.