

USNRC REGION II  
ATLANTA, GEORGIA

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July 31, 1979  
L-79-204

Mr. J. P. O'Reilly, Director, Region II  
Office of Inspection & Enforcement  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII:RWW  
50-389/79-09

Florida Power & Light Company has reviewed the subject inspection report and our response is attached. There is no proprietary information contained in the report.

Very truly yours,

Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU:MV:cf  
Attachment

cc: T. E. Burdette  
R. W. Wright  
E. A. Adomat  
Harold F. Reis, Esquire

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OFFICIAL COPY

PEOPLE...SERVING PEOPLE



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ATTACHMENT

RII:RWW  
50-389/79-09

INFRACTION: Document Control - Failure to Follow Procedure

FPL Procedure ASP-4 and Site Quality Procedure (SQP) 7 which superceded the former procedure in June, 1979 require that when a change to a controlled design document is approved via an FCR/DCN, the specific FCR/DCN number is recorded on the reproducible and each controlled copy of the affected document. Contrary to this procedure, FCR 2-557 had been incorrectly recorded on both the QC and QA office copies of drawing 2998-G0517 R1. A review of the FCR file also disclosed that FCR 2-434 was applicable, but was not recorded on the subject drawing. This item of noncompliance was originally identified in NRC Inspection Report 50-389/79-01 dated February 21, 1979. FPL responded that all necessary corrective actions would be accomplished by March 31, 1979. During this June inspection, it was determined that this item of noncompliance had not been fully corrected.

RESPONSE:

All copies of 2998-G0517 R1 have been corrected by properly recording FCR 2-557 and adding FCR 2-434.

We have taken a number of actions to avoid further noncompliance. An experienced Document Control Supervisor was employed by the site. In addition, one of the senior clerks in Document Control was assigned responsibility for conducting internal audits of drawings for correct FCR/DCN notations and revision levels. The area engineering staff will check each safety-related drawing for correct revision level and FCR/DCN notations. These checking actions have been implemented to assure use of only the most current version of the drawings prior to use in construction or verification activities. Total review, updating, issue, and maintenance of the issued drawings are now in progress, with completion estimated 24 September 1979. QA audit of currency of stick prints versus Document Control Card Files will continue on a periodic basis. Audit results will be reported to the Construction Site Manager for corrective action attention as indicated in the Audit Reports.

On July 16, 1979 QA performed a verification of the corrected cards and masters and no deficiencies were found. The check actions by area engineer and QC Inspections have been surveilled and found to be implemented. At intervals during the corrections to the issued documents, audits will be performed to determine the effectiveness of the corrective actions being taken.

The correction to drawing 2998-G0517 R1 was completed prior to our revised response to 50-389/79-01 dated June 28, 1979 (L-79-175). In that response we also indicated our estimated completion date for the currently in progress review, update and maintenance of the field issued drawings as September 24, 1979.



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In order to control uncorrected drawings prior to our commitment date of September 24, the area engineering staff will check each field issued safety-related drawing against the already corrected card for correct revision level and DCR/DCN notations prior to starting work defined by that drawing. These cards are kept up to date on a daily basis.

To provide assurance that construction completed under the old drawings was correct, an investigation was conducted of all major changes (as defined per SQP-17) implemented by FCR's or DCN's during the period July, 1977 to present. All FCR's & DCN's had been observed in initial inspections during that period of time. The results of this investigation are as follows:

Major FCR's	18	Major DCN's	32
Less temp FCR's	4	Less temp DCN's	6
Subtotal:	14	Subtotal:	26
Reinspected by QC	5	Reinspected by QC	11

The 16 samples reinspected on 21 and 22 July confirmed use of the most current design documents at time of initial inspection by QC.

The NRC was informed by telecon of these results. Records of these inspections are available in the QA Vault. Also, the standard QC procedure for verification of design change as defined by CPL QI 3.1 was reviewed with the NRC. This standard procedure was used by QC during this entire period.

As a result of this inspection report, site management controls as described in Site Quality Procedures and the FPL QA Manual have been reviewed and determined to be adequate. In order to assure their implementation, cognizant management personnel have been reindoctrinated in their responsibility to provide timely and effective corrective action on quality problems. As additional management action we have revised our tracking system for written commitments to NRC. The Licensing and Environmental Planning Department (LEP) will periodically prepare a list of FPL commitments to NRC. Such a list will be distributed to all responsible departments and to the Quality Assurance Department. LEP will follow-up on those commitments involving written response to NRC. QA will follow those commitments requiring action without a follow-up response. Shortly after its due date QA will verify that the committed action has been taken, and if not, will immediately notify LEP, the responsible department head and the Vice President of Advanced Systems & Technology for appropriate action. These actions should preclude reoccurrence of conditions similar to those identified in this report.

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