



April 6, 1981
L-81-158

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

Dear Mr. O'Reilly:

Re: RII:
50-335/81-02

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

There is no proprietary information in the report.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/JEM/ras

Attachment

cc: Harold F. Reis, Esquire

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ATTACHMENT

FINDING A:

Technical Specification 3.7.12.a requires that when all electrical penetration fire barriers protecting safety related areas are not intact, a fire watch patrol to inspect at least one side of the penetration(s) must be established within one hour.

Contrary to the above, fire barriers were not intact and a fire watch patrol was not provided on January 6, 1981, when several penetrations in the cable spreading room were found open.

RESPONSE A:

- 1) FPL concurs with the finding.
- 2) The finding resulted from inadequate controls.
- 3) Immediate action was taken to ensure compliance with applicable specifications.
- 4) Additional controls have been instituted which require specific approval for degraded electrical penetration fire barriers.
- 5) Full compliance was achieved January 16, 1981. Licensee Event Report 81-01 was also issued.

FPL would like to point out that the inspector stated he notified the Nuclear Plant Supervisor (NPS) on January 6, 1981. The NPS involved could not recall such notification. The plant staff took immediate steps when they became aware of this problem immediately prior to the exit interview on January 16, 1981. Discussions with the NRC Resident Inspector following this occurrence should provide for more positive communications regarding plant problems.

FINDING B:

10 CFR 50, Appendix B, Criterion V, as implemented by Florida Power and Light Company Topical Quality Requirement 5.0, requires that activities affecting quality for nuclear safety related structures, systems and components shall be prescribed, and accomplished in accordance with documented instructions. St. Lucie implementing procedure, QI-4 PR/PSL-1, provides various requirements for assuring that all technical requirements are included in the purchase orders/requirements and requires QC/QA review and approval.

Contrary to the above, activities affecting quality were not prescribed by documented instructions in that Pacific Scientific Mechanical Snubbers were ordered, reviewed and approved for purchase by Turkey Point personnel for St. Lucie. The purchase order did not require compliance with applicable FPL specifications for mechanical snubbers nor did it require certification of compliance with applicable functional test requirements of FPL Snubber specifications or of specific St. Lucie technical requirements.

RESPONSE B:

- 1) FPL concurs with the finding.
- 2) This order took place in 1978 and is considered an isolated case.
- 3) Snubbers were evaluated in 1979 for proper technical requirements.
- 4) Changes to applicable quality procedures have been submitted for review and approval.
- 5) The quality procedure changes are expected to be completed by July 1, 1981. Full compliance on this item will be achieved at this time.

FINDING C:

10 CFR 50, Appendix R, Criterion V, as implemented by Florida Power and Light Company Topical Quality Requirement 5.0 requires that activities affecting quality of nuclear safety related structures, systems and components shall be described by documented instructions, and shall be accomplished in accordance with those instructions. Implementing procedure, QI-7 PR/PSL-2, paragraph 5.6, requires that QC material shall be receipt inspected using acceptance criteria included in applicable receiving inspection checklists.

Contrary to the above, activities affecting quality were not accomplished as described by instructions in that the receiving inspection checklist for Pacific Scientific snubbers purchased on Purchase Order No. 71059-63078P and 65255-06810W required documentation/certification of compliance with purchase-orders-specified functional tests in accordance with procedure EPP-MS-276. Certification for the above snubbers verify conformance with the purchase order and Pacific Scientific functional tests using Pacific Scientific procedure 524L rather than EPP-M-276. No record was available that showed that Pacific Scientific procedure 524L was compared to FPL specification EPP-MS-276 or that Pacific Scientific procedure 524L was even available to QC. Also, no record was available to show that QC receiving inspection had questioned the situation. The QC supervisor stated that the case was inspector error.

RESPONSE C:

- 1) FPL concurs with the finding.
- 2) This is considered to be an isolated case by the inspector.
- 3) Snubbers were evaluated for technical requirements and accepted.
- 4) No further action is considered necessary.
- 5) FPL is expected to have a written record of this comparison on file May 1, 1981.

STATE OF FLORIDA)
)
COUNTY OF DADE) ss.

Robert E. Uhrig, being first duly sworn, deposes and says:

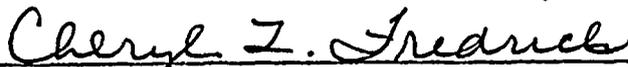
That he is a Vice President of Florida Power & Light Company, the Licensee herein; -

That he has executed the foregoing document; that the statements made in this said document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.


Robert E. Uhrig

Subscribed and sworn to before me this

6 day of April, 1981


NOTARY PUBLIC, in and for the county of Dade, State of Florida

My commission expires: Notary Public, State of Florida at Large
My Commission Expires October 30, 1983
Bonded thru Maynard Bonding Agency