P.O. BOX 529100 MIAMI, FL 33152

FLORIDA POWER & LIGHT COMPANY

May 7, 1981
L-81-176

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

Dear Mr. O'Reilly:

Re: St. Lucie Unit 1
Docket No. 50-335
IE Inspection Report 81-04

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/PLP/ras

Attachment

cc: Harold F. Reis, Esquire

ATTACHMENT

RE: ST. LUCIE UNIT 1
DOCKET NO. 50-335
IE INSPECTION REPORT 81-04

FINDING A:

A. 10 CFR 50, Appendix B, Criterion VI states measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which shall prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release and are distributed to and used at the location where the prescribed activity is performed. The accepted QA program Topical Quality Requirement 6.0, Document Control, Revision 0 dated January 23, 1976, states that quality procedures shall delineate the control measures for controlled documents, including distribution and verification that changes are promptly incorporated. These control measures shall apply to documents affecting the quality of nuclear safety related structures, systems and components such as plant operating and maintenance procedures. QA Manual Procedure Number QP 5.1, Revision 3 dated November 1980, Section 5.3 requires a written procedure delineating the methods for requesting, reviewing, approving and documenting revisions and temporary changes to procedures.

Contrary to the above, measures have not been established to control issuance of temporary changes to operating procedures approved by the Facility Review Group. These changes were not distributed to locations where the activities were performed. Methods for requesting, reviewing, approving and documenting temporary changes to procedures were not provided.

RESPONSE A

1. FPL does not concur with the finding as written. It is our opinion that St. Lucie Unit 1 has established measures to control temporary changes to procedures and that these measures are in accordance with the FPL QA requirements.

2. NA

3. FPL has examined the methods used to control temporary changes. Quality Instruction 5.5.4 gives instructions for requesting, reviewing, approving and documenting temporary changes to procedures. Because these changes are made by the crew working with the procedure (with appropriate approval) it is our opinion that these temporary changes were available at the location where the activities were performed. Although these instructions meet the requirements of our QA program, weaknesses were found to exist in our methods of controlling temporary changes. This was also noted in the NRC Management Inspection conducted November-December 1980.

4. As corrective action to avoid further problems, we are developing instructions and forms to provide strict controls for temporary changes. These instructions are expected to be implemented by May 15, 1981.

FINDING B:

10 CFR 50, Appendix B, Criterion V requires activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these documents. Documents shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities had been satisfactorily accomplished. The accepted QA Program Tropical Quality Requirement 5.0 Instructions, Procedures, and Drawings, Revision 0, dated January 23, 1976, states that activities affecting quality of nuclear safety related structures, systems, and components shall be prescribed by documented insructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. These documents shall include appropriate quantitative and qualitative criteria to assure that the quality assurance activity has been satisfactorily accomplished. Technical Specification 6.8.1 requires written procedures be established, implemented and maintained covering the applicable activities recommended in Appendix "A" of Regulatory Guide 1.33, November 1972; operating procedures are included as typical safety-related activities to be covered by written procedures.

Contrary to the above, certain operating procedures did not contain appropriate quantitative or qualitative acceptance criteria for assuring that important activities were satisfactorily accomplished. The following examples indicate that activities affecting quality had not been conducted in strict adherence to the approved procedure:

1. Operating Procedure 0350020 - Fuel Pool Cooling and Purification System - Normal Operation, Revision 3, dated January 1976.

   a. Valves V4255 through V4260 and V4803 were not shown on the valve lineup.

   b. A valve number was not assigned to the Fuel Pool Ion Exchanger Air Connection Valve.

   c. Step 8.3.5 replaced blind flanges removed in step 8.3.3, blind flanges were not removed in the step specified.

2. Operating Procedure 0210020 - Charging and Letdown Normal Operation, Revision 13, dated January 1981, did not provide numbers on four valves.

3. Operating Procedure 0420020 - Containment Spray Initial Valve Lineup, Revision 10, dated Febrary 1980, listed several valves that were not numbered. These valves also did not appear on the piping and instrumentation drawing for that system.

4. Operating Procedure 2200020 - Emergency Diesel Generator Standby Lineup, Revision 3, dated May 1980.

   a. Several valves had incorrect numbers assigned (V-17350, V-17304, V-17314).

b. Several valves on the valve lineup were not numbered.

c. Several instrument isolation valves were not identified on the valve lineup.

RESPONSE B:

1) FPL concurs with the finding.

2) FPL attributes these errors to oversight.

3) Procedure changes have been approved or submitted for review and approval which correct these deficiencies.

4) Most of the valves identified in the inspection report consisted of instrument isolation valves or bypass valves which are part of the larger valve. In these cases FPL considered that the procedure is adequate and presents no adverse affects on safety because the description provided is self explanatory. In the other cases the discrepancies will be corrected.

5) Full compliance will be achieved by May 15, 1981.

STATE OF FLORIDA)
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ss.
COUNTY OF DADE)

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

7 day of May, 1981.

Cheryl L. Fredricks

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 1981