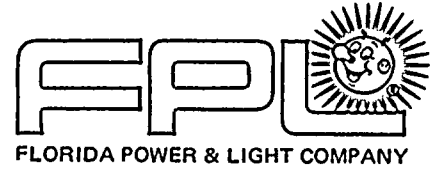


USNRC REGION I
ATLANTA, GEORGIA

81 NOV 20 A 9: 58



November 16, 1981
L-81-479

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:

Reference: St. Lucie Unit 1
Docket No. 50-335
IE Inspection Report 81-22

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,

A handwritten signature in cursive script, appearing to read "Robert E. Uhrig".

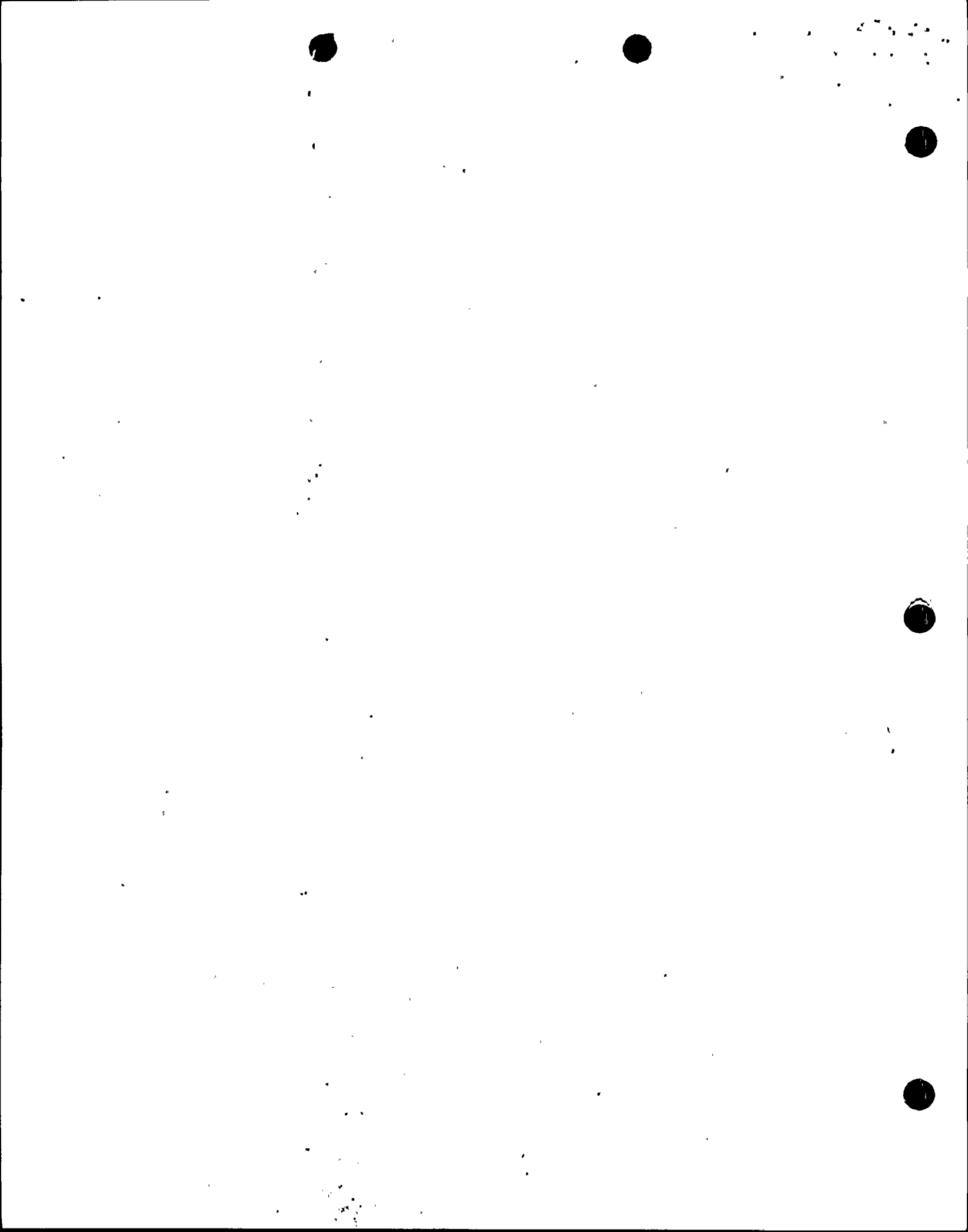
Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/pat

Attachment

CC: Harold F. Reis, Esquire

8112230316 811215
PDR ADDCK 05000335
G PDR



ATTACHMENT

Re: St. Lucie Unit 1
Docket No. 50-335
Inspection Report 81-22

A. Finding

1. Operating Procedure 1610020, Rev. 6, Receipt and Handling of New Fuel, requires in paragraph 4.10 that "Prior to unloading the shipping containers, the new fuel and spent fuel storage areas shall be clean and any dirt producing operations shall be "stopped". On August 20, 1981, new fuel was being unloaded and stored in vertical racks on the new fuel storage floor (42 ft level). The area was not clean. Debris included many small wooden chips, rubber bands, several pieces of plastic, and masking tape.

Response

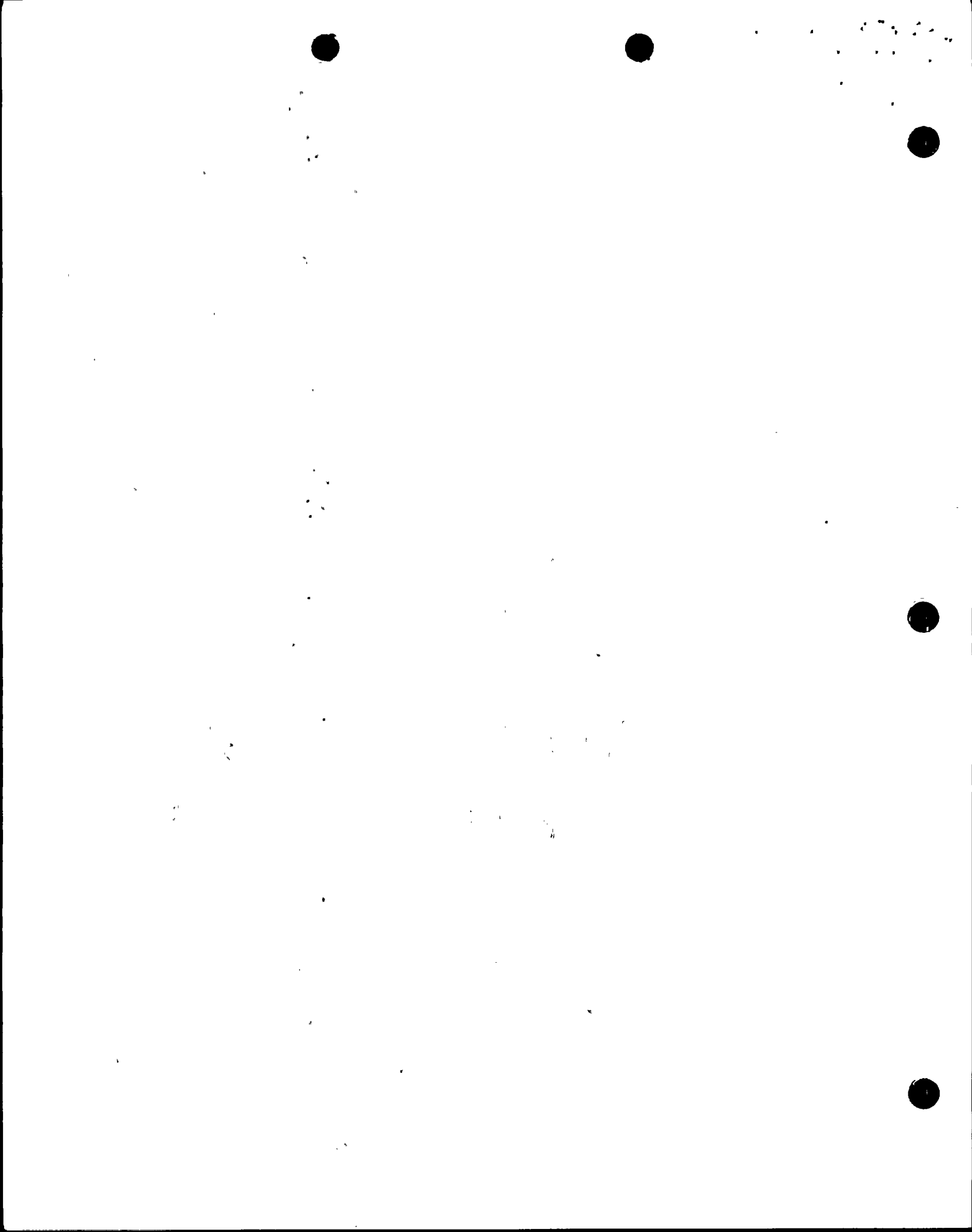
- a. FPL concurs with the finding.
- b. This problem was caused by personnel oversight.
- c. As corrective action the area was cleaned.
- d. To prevent further problems, the item was discussed with personnel involved.
- e. Full compliance was achieved prior to resumption of fuel receipt.

Finding

2. Operating Procedure 1630028, Rev. 0, New Fuel Handling Crane Operation, requires in paragraph 7.2 that prior to refueling or any fuel handling evolution involving the new fuel handling crane, section 8.1.1 through 8.4.4 shall be completed. Section 8.1 includes the acceptance criteria for pre-operational checkout. The new fuel handling crane had not been checked out in accordance with OP 1630028 prior to use on September 9, 1981. The procedure was over-looked. A contributing factor was that OP 1610020 referred to in paragraph A.1 above did not include OP 1630028 as a pre-requisite.

Response

- a. FPL concurs with the finding.
- b. The problem was caused by personnel oversight.
- c. As corrective action the check-out of the crane was conducted in accordance with the correct procedure.
- d. The "Receipt and Handling of New Fuel" procedure has been revised to reference the crane checkout procedure.
- e. Full compliance was achieved September 25, 1981.



Finding

3. Operating Procedure 0010122, Rev. 2, In-plant Equipment Clearance Orders requires a clearance when inadvertent operation of equipment could create a hazard to personnel or equipment. Switches and valves are positioned and tagged prior to a clearance being granted. Clearances are granted by the Watch Engineer. On September 9, 1981, a person isolated the discharge pressure Gage from an operating, safety-related Auxiliary Feed pump with a single valve isolation and commenced removing the gage with no clearance or other apparent permission from the Nuclear Watch Engineer. At the time, the pump discharge pressure was over 1000 psig and the pump was being used to feed the steam generators for reactor decay heat removal.

Response

- a. FPL concurs with the finding.
- b. This problem was caused by personnel oversight.
- c. No immediate action was taken. The job was complete before action could be taken.
- d. The personnel involved were instructed to follow appropriate procedures.
- e. Full compliance was achieved on September 10, 1981.

B. Finding

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed and accomplished in accordance with documented instruction or procedures appropriate to the circumstances and shall include appropriate acceptance criteria. Florida Power and Light Company Quality Procedure 11.2, Test Control - Operation, Section 5.3.1, states that retesting procedures shall include a documented functional check of the equipment operability.

Contrary to the above, a test procedure was neither written nor performed to confirm satisfactory operation of the Emergency Notification System (ENS) telephone upon completion of plant change modification 112-80. Due to an error in hookup, the ENS was powered from a non-vital bus so that power would have been lost during a station blackout.

Response

- a. FPL does not concur with this finding for the following reasons:
 1. The criteria cited in the finding is 10 CFR 50, Appendix B, Criterion V. This criteria is applicable to those systems and items which are safety related as determined and defined in the FPL Quality Assurance Manual. This installation was determined as not safety related and not affecting the safety of the nuclear plant. Having made that determination, Appendix B to 10 CFR 50 is not applicable with regard to testing.

2. Activities for installation and testing are required to be commensurate with its importance to safety. FPL does not consider the ENS to have any plant safety significance.
3. It should also be noted that FPL letter L-80-288 dated 9/2/80 stated that such testing would not be conducted following the plant change. FPL was not notified that this was not satisfactory.
4. The ENS circuit has been properly connected such that it will be powered from the Emergency Power Sources with a loss of offsite power. FPL intended to and did test this function during the 1981 refueling outage as part of the loss of off-site power test as requested by the NRC in their letter requiring emergency power for the ENS.

STATE OF FLORIDA)
)
COUNTY OF DADE) ss.

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

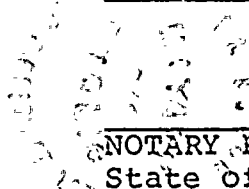
That he is Vice President of Florida Power & Light Company, the herein;

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


Robert E. Uhrig

Subscribed and sworn to before me this

16 day of November, 1981


Cheryl L. Fredrick
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

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