

APPENDIX A

NOTICE OF VIOLATION

Florida Power & Light Company
St. Lucie 1

Docket No. 50-335
License No. DPR-67

As a result of the inspection conducted on August 11 - September 10, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

- A. Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972. Areas included in this Appendix A are preparation for refueling and method of obtaining permission and clearance to work.

Contrary to the above, procedures were not implemented in that:

1. Operating Procedure 610020, 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.
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.
3. Operating Procedure 0010122, Rev. 2, In-plant Equipment Clearance Orders requires a clearance when inadvertant 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.

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This is a Severity Level V Violation (Supplement I.E.).

- B. 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.

This is a Severity Level V Violation (Supplement I.E.).

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

The responses directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Date: OCT 16 1981

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