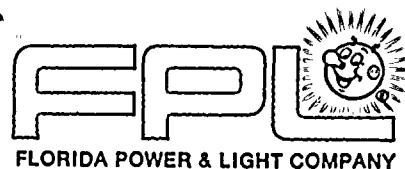


NRC REGION
IIA, 6032



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February 12, 1982
L-82-52

Mr. James P. O'Reilly
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: St. Lucie Unit 1
Docket No. 50-335
IE Inspection Report 81-30

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,

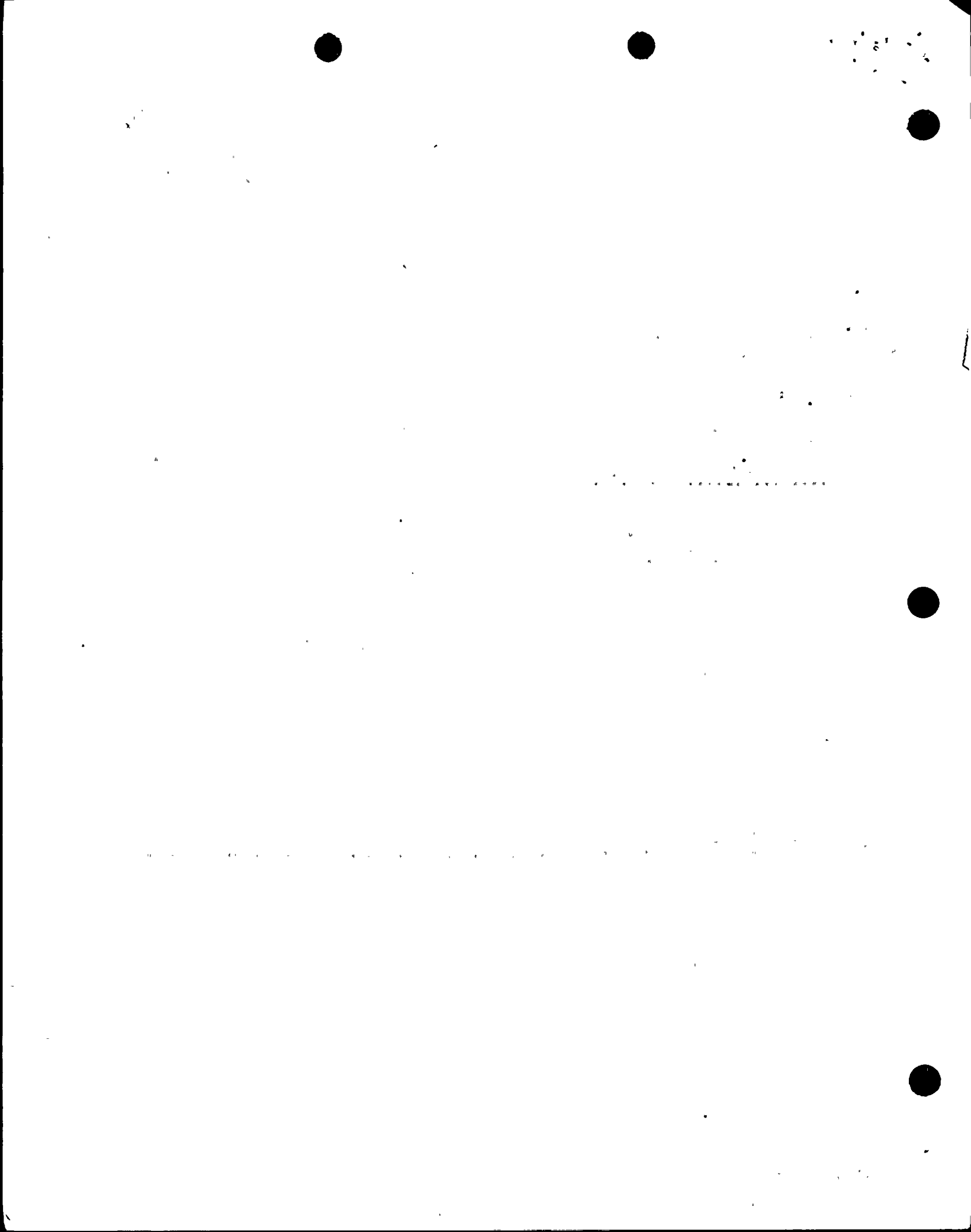
Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/mbd

Attachment

cc: Harold F. Reis, Esquire

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PDR ADDCK 05000335
Q PDR



ATTACHMENT

Re. St. Lucie Unit 1
Docket No. 50-335
IE Inspection Report 81-30

Finding:

Technical Specification 6.8.1.c requires that written procedures shall be established, implemented and maintained covering surveillance and test activities of safety-related equipment.

Contrary to the above, the surveillance procedure for local leak rate testing of containment isolation valves was inadequate in that the procedure did not always provide an atmospheric vent path downstream of the valve under test, did not provide for demonstration that other pressure sources which could affect the test were in fact isolated and not leaking into the test area, and did not address all valves requiring alignment in order to conduct a valid test.

Response:

FPL does not concur with this finding for the following reasons:

By plant design, there are no available vent paths in the indicated cases. In these cases there is, however, a large (admittedly unvented) volume which would have to be filled by the leak tester to give false results. The filling process would itself give unacceptable leakage indication.

If this same volume (which is vented to 0 psig before testing) were being pressurized by outside leakage, large leak rates would make venting impossible, small leak rates would have no effect and the probability of a leak rate just the size to give false results is very low. Valve alignments to isolate test boundaries are in fact covered by the plant tagout procedure which requires full isolation for personnel and equipment protection.

Finally when some of the disputed systems were retested with piping physically opened or outside sources verified isolated the results generally did not change at all. In one case the slight increase observed was within the accuracy of the test method.

We have always followed the practice of doing this testing under the direct supervision of a trained engineer. We do not use maintenance personnel or even technicians for the express reason of ensuring proper, valid testing. This valid testing is best demonstrated by the fact that results of both the initial and first periodic Integrated Leak Rate Test at St. Lucie were a factor of 10 below the allowable limit.

Again, we do not feel the procedure, done by trained engineers in conjunction with other procedures (such as the tagout procedure) is inadequate.

To preclude future problems in this area, we do agree to revise the procedure, before the next performance, to more clearly address the disputed areas.

CONFIDENTIAL

The following information was obtained from a confidential source who has provided reliable information in the past. It is being furnished to you for your information and is not to be disseminated outside your agency.

IDENTIFICATION OF SOURCE

The source is a male, approximately 40 years of age, of [redacted] origin. He is currently residing in [redacted] and is employed as a [redacted].

The source has been in contact with [redacted] and has provided information regarding [redacted]. The source is being provided to you for your information and is not to be disseminated outside your agency.

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