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 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH. NAME: WOODY, C. O. AUTHOR AFFILIATION: Florida Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Repts 50-335/87-10 & 50-389/87-09. Corrective actions: personnel involved counseled on applicable procedural requirements & special procedure for alternate sampling methods will be generated.

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JUNE 23 1987

L-87-257
10 CFR 2.201

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Inspection Report 335/87-10 and 389/87-09

Florida Power & Light Company has reviewed the subject inspection report, and pursuant to the provisions of 10 CFR 2.201 the response is attached.

There is no proprietary information in this report.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

COW/GRM/gp

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant

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PDR ADDCK 05000335
Q PDR

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Inspection Report 335/87-10 and 389/87-09

VIOLATION A

Unit 1 Technical Specification (TS) 6.8.1.a, requires that written procedures shall be implemented covering the activities referenced below: Applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Revision 2, February 1978, Appendix "A", states, the following are typical safety-related activities that should be covered by written procedures: Administrative Procedures, Procedures for Control of Radioactivity, and Procedures for Performing Maintenance.

Administrative Procedure (AP) 0010432, Nuclear Plant Work Orders, requires that all modifications performed by Florida Power and Light Maintenance personnel and maintenance directed work by contractors and vendors at the St. Lucie Plant be authorized through a Nuclear Plant Work Order.

AP 0010124, Control and Use of Jumpers and Disconnected Leads, which requires jumpers (temporary alterations) to be controlled by procedures or by the use of the "Jumper/Lifted Lead Request Log."

Operating Porcedure (OP) 0010129, Equipment Out of Service - Class I, requires that appropriate entries be made to the out of service log when class I equipment is removed from service.

Contrary to the above, on April 15, 1987, the licensee failed to properly implement the procedural requirements for a Work Order, the Jumper/Lifted Lead Request Log and the Equipment Out of Service Log for the temporary shifting of the fuel handling building (FHB) exhaust ventilation radiation monitoring suction to the emergency core cooling system (ECCS) exhaust ventilation system.

RESPONSE A

1. FPL concurs with the violation.
2. Failure to follow the specified procedures as required was the reason for the violation.
3. All personnel involved were counseled on the applicable procedural requirements and the need for compliance.
4. FPL believes that the procedural nonconformance involved in this violation is an isolated case and was due to the circumstances involved in this particular event. The action taken above will be sufficient to prevent recurrence.
5. Full compliance was achieved on June 8, 1987.



Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
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VIOLATION B

Unit 1 TS 3.3.3.10 requires that radioactive gaseous effluent monitoring instrumentation channels shown in Table 3.3-13 shall be operable. Action statement b. requires that with less than the minimum number of channels operable, as specified in Table 3.3-13, the action specified in the Table be taken. Table 3.3-13 item 5.a. FUEL STORAGE AREA VENTILATION SYSTEM (Noble Gas Activity Monitor), requires that Action 3 be taken when the minimum number, one in this case, of channels are not operable. Action 3 requires that effluent releases via this pathway may continue up to 30 days provided grab samples are taken at least once per 8 hours and these samples are analyzed for isotopic activity within 24 hours.

Contrary to the above, the FUEL STORAGE AREA VENTILATION SYSTEM (Noble Gas Activity Monitor) for the FHB exhaust ventilation radiation monitor was rendered inoperable with the ventilation fan continuing to operate (effluent release) without taking the required grab samples. This condition existed from April 15, 1987, when a temporary alteration was made by plant personnel shifting ventilation exhaust, until April 20, 1987, when plant personnel realized that the FHB exhaust fans were still running.

RESPONSE B

1. FPL concurs with the violation.
2. The reason for the violation was the belief by personnel involved that the ventilation pathway was secured.
3. The release (ventilation fan) was immediately secured when the operation department was notified of the condition. The FHB Area Radiation Monitors were operable during this period; no FHB work involving irradiated fuel took place during this period; and routine FHB Exhaust Ventilation samples taken before and after the period of unmonitored operation were normal.
4. A special procedure for alternate sampling methods will be generated for delineating all administrative procedures required, in a step by step format, to complete these functions. This procedure will also require that the nuclear plant supervisor provide signature approval on a release form prior to commencement of alternate sampling methods. Conformance to this procedure will be sufficient to prevent recurrence.
5. Full compliance will be achieved by June 30, 1987.