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 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.
 AUTH. NAME JODY, C. O. AUTHORITY AFFILIATION Florida Power & Light Co.
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SUBJECT: Forwards revised response to Insp Repts 50-335/87-11 & 50-389/87-11 initially submitted by Util L-87-343 ltr.

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AUGUST 21 1987

L-87-352
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 335/87-11 and 389/87-10 Revised Response

As discussed with your staff on August 20, 1987, the attached response to the subject inspection report replaces our response submitted by Florida Power & Light letter L-87-343.

There is no proprietary information in this report.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

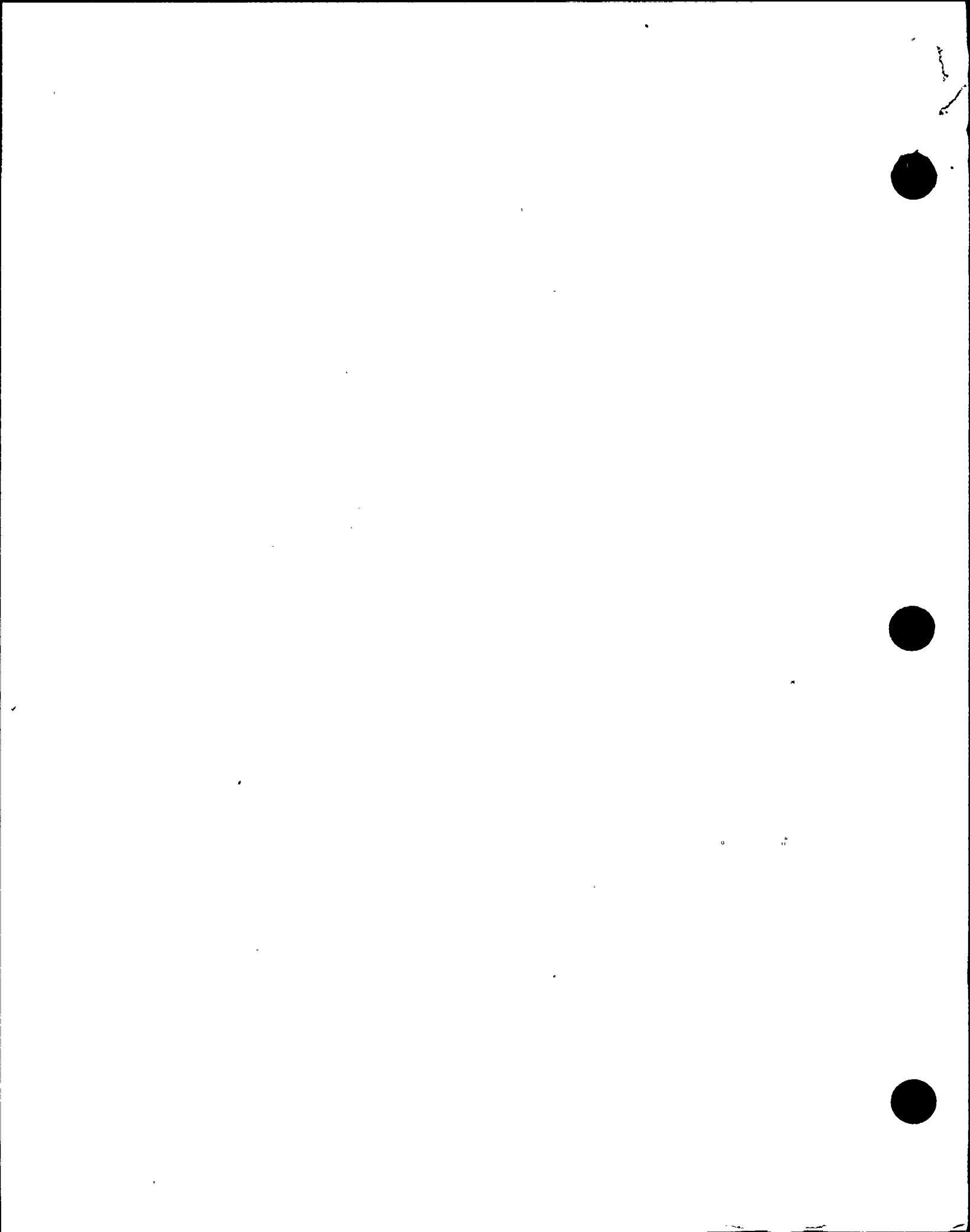
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Attachment

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

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Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Inspection Report 335/87-11 and 389/87-10 Revised Response

VIOLATION

During the Nuclear Regulatory Commission (NRC) inspection conducted on June 22-26, 1987, a violation of NRC requirements was identified. The violation involved inadequate procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violation is listed below:

Unit 1 Technical Specification (TS) 6.8.1.a, requires that written procedures be established, implemented, and maintained for activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, states that the following is a typical safety-related activity that should be covered by written procedures: PWR Gaseous Effluent System-Collection, Storage, and Discharge.

Contrary to the above, Operating Procedure (OP) 1-530020, Revision 8, July 15, 1985, Waste Gas System Operation and 1-0530021, Revision 30, January 28, 1987, controlled Gaseous Batch Release to Atmosphere, were inadequate in that the details for the Unit 1 waste gas system operation and for the waste gas system lineup were not included in the procedures to reflect the current mode of operation

RESPONSE

1. Florida Power & Light Company (FPL) concurs with the violation.
2. Through personnel oversight, the Unit 1 system operating procedure was not updated as required to be consistent with the current mode of operation.
3. A temporary change to Operating Procedure 1-0530020 has been implemented and will remain in effect until the procedure is revised to reflect the current method of operation. Operating Procedure 1-0530021 did not require any changes because it is valid for batch releases.
4. Responsible plant personnel have been made aware of this violation and the need to address all aspects of changes in operating methodology. FPL believes that this action is sufficient to prevent recurrence.
5. The procedure revision is expected to be issued by August 31, 1987.

