



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report Nos.: 50-335/87-23 and 50-389/87-22

Licensee: Florida Power and Light Company
9250 West Flagler Street
Miami, FL 33102

Docket Nos.: 50-335 and 50-389

License Nos.: DPR-67 and NPF-16

Facility Name: St. Lucie 1 and 2

Inspection Conducted: October 19-23, 1987

Inspector: B. R. Crowley for 11/2/87
W. P. Kleinsorge Date Signed

Approved by: B. R. Crowley for 11/2/87
J. J. Blake, Chief Date Signed
Materials and Processes Section
Division of Reactor Safety

SUMMARY

Scope: This routine, unannounced inspection was conducted in the areas of Licensee actions on previous enforcement matters (92701B) (92702B), housekeeping (54834B), material identification and control (42902B) material control (42940B), Inservice Inspection (ISI) (Unit 2), Inservice Testing (IST) of Pumps and Valves (73756) (Units 1 & 2), and Spray Nozzle Flow Verification.

Results: One violation was identified - "Failure to Follow Document Control Procedure" - paragraph 7e(1). No deviations were identified.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *G. L. Boissy, Plant Manager
- *L. W. Pearce, Operations Supervisor
- *D. West, Technical Supervisor
- *D. Stewart, Technical Department Supervisor
- *V. Chilson, Nuclear Energy Staff
- *F. Carr, Nuclear Energy Staff

Other licensee employees contacted included engineers, technicians and office personnel.

NRC Resident Inspectors

- R. Crlenjak, Senior Resident Inspector
- *H. Bibb, Resident Inspector

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on October 23, 1987, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings. No dissenting comments were received from the licensee.

Inspector Follow Item 50-335/87-23-02 and 50-389/87-22-02: "IST Program Inconsistencies" - paragraph 7e(2).

The exit interview was scheduled early for the convenience of the licensee; therefore, inspection continued after the exit interview. The following item was identified by the inspector after the exit interview and reported to the plant manager, prior to the inspector's departure from the site.

Violation 50-335/87-23-01 and 50-389/87-22-01: "Failure to Follow Document Control Procedure" - paragraph 7e(1).

The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection.

3. Licensee Action on Previous Enforcement Matters (92701B) (92702B)

This subject was not addressed in the inspection.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Independent Inspection Effort

Housekeeping (54834B), Material Identification and Control (42902B) and Material Control (42940B)

The inspector conducted a general inspection of the protected area and the Unit 2 auxiliary and containment buildings to observe activities such as housekeeping, material identification and control; material control, and storage.

Within the areas examined, no violations or deviations were identified.

6. Inservice Inspection (ISI) (Unit 2)

The inspector reviewed procedures, interviewed licensee/contractor personnel and reviewed records to determine whether the licensee's program and procedures, pertaining to the Inservice Inspection (ISI), were complete and in conformance with regulatory requirements and the licensee's commitments, as indicated below. The applicable code for ISI for Unit 2 is ASME Boiler and Pressure Vessel Code (ASME B&P) Code, Section XI, 1980 Edition Winter 1980 Addenda. Unit 2 was issued their Operating License April 6, 1983. Unit 2, which commenced commercial operations August 8, 1983, is currently in the first outage of the second 40-month period of the first ten year interval of inservice inspection, August 8, 1983 to August 8, 1993. The Licensee, Florida Power and Light (FP&L), has contracted with Combustion Engineering (CE), Zetech (Z) Ebasco (E) and NDE Technology (NDET) to provide personnel and equipment to perform inservice examinations under the FP&L Quality Assurance (QA) program.

a. Review of Procedures (73052)

(1) Program Requirements

The inspector reviewed the licensee's commitments in the SAR, Technical Specification (TS), and approved ISI program to ascertain whether ISI procedures adequately covered all areas specific in the licensee's commitments for ISI requirements.

(2) Procedure Approval

The inspector reviewed the below listed procedures to determine whether the ISI procedures had been approved by authorized licensee personnel and by the Authorized Nuclear Inservice Inspector (ANII) where applicable.

Document Examined

<u>Identification</u>	<u>Title</u>
FP&L-NDE-1.3, Rev. 1	"Eddy Current Examination of Non-Ferromagnetic Tubing with Multi Frequency Techniques MIZ-18"
FP&L-NDE-3.3, Rev. 0	Liquid Penetrant Examination Solvent-Removable, Visible Dye Technique"
FP&L-NDE-5.2, Rev. 2	"Ultrasonic Examination of Ferritic Piping Welds"
FP&L-NDE-4.3, Rev. 0	"Visual Examination VT-3 & VT-4"

(3) Non-Destructive Examination (NDE)

(a) Procedure Review

The inspector reviewed the procedures indicated in paragraph 4) below to determine whether requirements were specified, and agree with licensee's commitments including: specified or referenced acceptance levels; qualifications of NDE personnel are specified in accordance with the licensee's approved ISI program; methods of recording, evaluating and dispositioning findings were established and reporting requirements were in compliance with applicable Code requirements; and procedures delineate the scope of work and division of responsibilities between the licensee and the contractor.

(b) Technical Content

1) Eddy Current Examination

The inspector reviewed the below listed eddy current examination procedures to determine whether they contained information or reference to a general inspection procedure or supplementary instructions sufficient to assure that all parameters are specified and controlled within the limits permitted by the applicable Code and other additional specification requirements; each essential examination variables were defined and whether these variable were controlled within the limits specified by the applicable Code and other specifications/contract requirements. Specific areas examined were:

multi-channel examination unit is specified; method of examination was described; method of calibration and sequence of calibration was described; requirements of TS or ASME Code Section XI had been addressed; procedures meet the requirements and intent of RG 1.83; and licensee had written approval for use of Code cases such as "N-401".

Procedure Examined

NDE-1.3, Rev. 1

2) Liquid Penetrant Examination

The inspector reviewed the below listed liquid penetrant examination procedure to determine whether they contained information or references to a general inspection procedure or supplementary instructions sufficient to assure that all parameters were specified and controlled within the limits permitted by the applicable Code and other additional specification requirements; each essential examination variables were defined and whether these variable were controlled within the limits specified by the applicable Code and other specification/contract requirements. Specific areas examined were: specified test method was consistent with applicable Code requirement; brand names and specific types number or letter designation, if available, of penetrant, penetrant remover, emulsifier and developer were specified; penetrant materials used for nickle base alloys were required by procedure to be analyzed for sulfur using the method prescribed by the applicable Code; penetrant materials used for the examination of austentic stainless steel were required by procedure to be analyzed for total halogens using the method prescribed in the applicable Code; method for acceptable pre-examination of surface preparation were specified and consistent with the applicable Code; area to be cleaned in consistent with applicable requirements; cleanliness acceptance requirements were consistent with applicable Code requirements; surface area to be examined was consistent with applicable Code requirement; procedure established a minimum drying time following surface cleaning; method of penetrant application and the penetration (dwell) time were specified and that the penetration time in consistent with the penetrant manufacturer's recommendation; examination surface was specified and was consistent with the applicable Code; procedures (when applicable) specify acceptable methods for

removing water-washable penetrant consistent with the applicable Code; method of applying emulsifier (when applicable) and the maximum emulsifier (when applicable) and the maximum emulsification time was specified and consistent with the applicable Code; method for removal of solvent removable penetrant (when applicable) were specified; method of developer application and the time interval between penetrant removal and developed application specified; examination technique was specified and the permitted time interval during which the "final interpretation" was performed within the range of 7-30 minutes after developer application; minimum light intensity at the inspection site was prescribed; technique for evaluation of indications is specified, acceptance standards were included and these were consistent with applicable Code and specific contract requirement; reporting requirements are specified; and procedure requires requalification when changes were encountered.

Procedure Examined

NDE-3.3, Rev. 0

3) Ultrasonic Examination

The inspector reviewed the below listed ultrasonic examination procedure to determine whether they contain information or references to a general inspection procedure or supplementary instructions sufficient to assure that all parameters are specified and controlled within the limits permitted by the applicable Code and other additional specification requirements; each essential examination variables are defined and whether these variables are controlled with the limits specified by the applicable Code and other specification/contract requirements. Specific area examined were: the type of apparatus to be used including frequency range as well as linearity and signal attenuation accuracy requirements, was specified; the extent of coverage (beam angles, scanning surface, scanning rate and directions) as well as the scanning technique were specified and were consistent with the applicable ASME Code and contract requirements; calibration requirements, methods, and frequency including the type, size, geometry, and material of calibration blocks as well as location and size of calibration reflectors within the block were clearly specified and consistent with the applicable ASME Code and contract requirements; the sizes and

frequencies of search units were specified and were consistent with the applicable ASME Code and contract requirements; beam angle or angles are specified and were consistent with the applicable ASME Code and contract requirements; methods of compensation for the distance traversed by the ultrasonic beam as it passes through the material including distance - amplitude correction curves, electronic distance - amplitude correction and transfer mechanisms, if used, were specified and were consistent with the applicable ASME Code and contract requirements; reference reflectors for accomplishing transfer and the frequency of use of transfer mechanisms, if applicable, were specified and in accordance with ASME Code and contract requirements; the reference level for monitoring discontinuities was defined and the scanning gain setting specified and that these values were in accordance with the applicable ASME Code and contract requirements; methods of demonstrating penetration and coverage were established; levels or limits for evaluation and recording of indications were specified and were in accordance with applicable ASME Code and contract requirements; method of recording significant indications were established and that the reporting requirements were in accordance with applicable ASME Code and contract provisions; and acceptance limits are specified or referenced and were in accordance with the applicable ASME Code and specific contract requirements.

Procedure Examined

NDE-5.2, Rev. 2

4) Visual Examination

The inspector reviewed the below listed visual examination procedure to determine whether they contained information or reference to a general inspection procedure or supplementary instructions sufficient to assure that all parameters are specified and controlled within the limits permitted by the applicable Code and other additional specification requirements; each essential examination variables were defined and whether these variables were controlled within the limits specified by the applicable Code and other specification/contract requirements. Specific area examined were: method; application; how visual examination was to be performed; type of surface condition; method or tool for surface preparation; direct or remote viewing;

special illumination, instruments, or equipment; sequence of performing examination; data to be tabulated; acceptance criteria were specified consistent with the applicable Code and report form or general statement to be completed.

Procedure Examined

NDE-4.3, Rev. 0

b. Observation of Work and Work Activities (73753)

- (1) The inspector reviewed the licensee's ISI plans and schedules for the current inspection period of the inspection interval to determine whether changes to the inspection plan concerning component selection, etc. had been properly documented and approved.
- (2) The inspector reviewed the qualifications and certifications of the below listed inspection personnel observed during observation of work, to determine whether the qualification and certification records properly reflected the following: employer's name; person certified; activity qualified to perform; level of certification; effective period of certification; signature of individual certifying title and level; basis used for certification, and annual visual acuity, color vision examination, and periodic recertification.

<u>Examination Personnel</u>	<u>Method-Level</u>	<u>Organization</u>
WDJ	ET-II	FP&L
KJN	ET-III	Z
JMR	ET-III	CE
LAK	ET-I	CE
VRL	ET-III	NDET
RD	UT-II	E

(3) Eddy Current Examination

The inspector observed a portion of the eddy current examination indicated below to determine whether the following requirements were being met: examination personnel were knowledgeable of examination method and operation of test equipment; examination personnel with proper level of qualification and certification were performing the various examination activities, including designation of examination method/technique to be used, equipment calibration, examination, and interpretation/evaluation/acceptance of test results; examination results, evaluation of results, and any corrective actions/repairs/replacements were recorded as specified in the ISI program and NDE procedures; if applicable: comparison of inservice findings

(adverse) with previous examination findings to determine any change in flaw size; and approved procedures were available, were followed, and specified nondestructive examination (NDE) equipment was used.

Examinations Observed

Acquisition of and evaluation of
data from Steam Generators A and B

(4) Ultrasonic Examination

The inspector observed a portion of the ultrasonic examinations indicated below to determine whether the following requirements were being met: examination personnel were knowledgeable of examination method and operation of test equipment; examination personnel with proper level of qualification and certification were performing the various examination activities, including designation of examination method/technique to be used, equipment calibration, examination, and interpretation/evaluation/acceptance of test results; examination results, evaluation of results, and any corrective actions/repairs/replacements were being recorded as specified in the ISI program and NDE procedures; if applicable, comparison of inservice findings (adverse) with previous examination findings to determine any change in flaw size; and approved procedures were available, were followed, and specified nondestructive examination (NDE) equipment was used, specific procedural areas examined included; type of apparatus; extent of coverage; calibration; size and frequency of searching units; beam angle; compensation for distance; reference reflectors; reference level; demonstrative of penetration; recording and evaluating of indications; and acceptance limits.

Examinations Observed

20-BF-14-FW2
20-BF-14-SW-P3

c. Steam Generator Tube Sample Selection and Inspection

By letter L-87-369 dated September 4, 1987 FP&L submitted a proposed license amendment to revise St. Lucie Unit 2 Technical Specification Surveillance Requirement 4.4.5.2, Steam Generator Tube Sample Selection and Inspection. This license amendment request proposed to add a new section which excludes tubes in the area affected by the diagonal support straps (batwings) from the sample selection. If excluded from the sample selection, FP&L proposed to examine 100% of this area.

The inspector discussed the above with the licensee, who informed the inspector that for this outage 100% of all tubes in both A and B generators will be eddy current examined using the standard bobbin Coil from tube-sheet to tube sheet, therefore, for this outage compliance to the above is moot.

Within the areas examined, no deviations or violations were identified.

7. Inservice Testing (IST) of Pumps and Valves (73756)

The inspector reviewed procedures, observed work activities and reviewed pertinent quality records, as indicated below, to determine whether inservice testing regulatory requirements and licensee commitments were being met. The applicable code for IST of pumps and valves is ASME Boiler and Pressure (ASME B&PV) Code Section XI 1974 Edition Summer 1975 Addenda (74S75) for Unit 1, and 80W81 for Unit 2. The effective dates for the current Unit 1 program is April 21, 1980 to February 11, 1988. The effective dates for the Unit 2 program is August 8, 1983 to August 8, 1993.

<u>Unit No.</u>	<u>Valve No.</u>	<u>Valve Data Examined</u>			
		<u>Code Category</u>	<u>Code Class</u>	<u>Size in</u>	<u>Valve Type (Operator Type)</u>
1	V-2515	A	1	2	Globe (Diaphragm)
1	V-07009	A (Passive)	2	2	Globe (Manual)
1	V-3660	B	2	3	Gate (Motor)
1	V-1403	B	1	2-1/2	Gate (Motor)
1	V-2443	C	2	3	Check
1	V-2345	C	3	2	Relief
1	I-V-18195	A/C	2	2	Check
2	SE-03-2B	A (Passive)	2	2	Globe (Solenoid)
2	V-2516	A	1	2	Globe (Diaphragm)
2	V-1463	B	2	1	Globe (Solenoid)
2	V-3717	B	2	12	Gate (Motor)

<u>Unit No.</u> (cont'd)	<u>Valve No.</u>	<u>Code Category</u>	<u>Code Class</u>	<u>Size in</u>	<u>Valve Type (Operator Type)</u>
2	V-2443	C	2	3	Check
2	V-2345	C	2	2	Relief
2	V-25-21	A/C	2	24	Check

- a. The inspector reviewed the last six completed procedures for the above listed valves to verify that the licensee performed IST per an approved schedule within the limitations described in the IST program, including increased frequency testing.
- b. The inspector reviewed the last six completed procedures for the above indicated valves to verify that inservice test results were recorded per the approved procedures and that data was evaluated within the time constraints delineated in the appropriate edition of the ASME Code Section XI, Subsection IWV.
- c. The inspector reviewed the data for the above indicated valves for the last six intervals to verify that IST data was evaluated per the requirements of ASME Code Section XI, Subsection IWV, and 10 CFR 50.55a(g) and ensure that appropriate followup actions were taken.
- d. The inspector examined selected records to verify that IST records were maintained as delineated in ASME IWV-6000; and that engineering evaluations, sufficient to justify changes to reference values and removal of increased frequency testing requirements, were documented and reviewed.
- e. Relative to the above, the inspector made the following observations.
 - (1) FP&L - Procedure Q16-PR/PSL-1, Revision 12, "Document Control", requires that procedures be implemented within 30 days of the approval date of the procedure, thus providing a 30 day grace period prior to the mandatory implementation date.

Contrary to the above the licensee failed to follow procedure as evidenced by the following examples relative to Administrative Procedure 1-0010125, "Schedule of Periodic Tests, Checks, and Calibrations."

Data Sheet 10 and 23 of Procedure 1-0010125 Rev. 52 were performed on November 11, 1983 and November 24, 1983, 189 & 202 days respectively after the mandatory implementation date of May 6, 1983 for Revision 53.

Data Sheet 10 and 23 of Procedure 1-0010125, Rev. 56 were performed on April 24, 1983, 48 days after the mandatory implementation date of March 7, 1983 for Rev. 57.

Failure to follow procedures for activities affecting quality is a violation of 10 CFR 50 Appendix B Criterion V. This violation will be identified as 50-335/87-23-01 and 50-389/87-22-01: "Failure to Follow Document Control Procedure."

- (2) ASME B&PV Code Section XI 74575 Paragraph IWV-3410(b)(1) states: "Valves shall be exercised to the position required to fulfill their function unless such operation is not practical during plant operation. If only limited operation is practical during plant operation the valve shall be part-stroke exercised during plant operation and full-stroked during each cold shutdown; in case of frequent cold shutdowns these valves need not be exercised more often than once every 3 months. Normally closed valves that cannot be operated during normal plant operation shall be full-stroke exercised during each cold shutdown; in case of frequent cold shutdowns these valves need not be exercised more often than once every 3 months." (Emphasis added) ASME B&PV Code Section XI 80W81 Paragraph IWV-3412(a) states: Valves shall be exercise to the position required to fulfill their function unless such operation is not practical during plant operation. If only limited operation is practical during plant operation, the valve shall be part-stroke exercised during plant operation and full-stroke exercised during cold shutdowns. Valves that cannot be exercised during plant operation shall be specifically identified by the Owner and shall be full-stroke exercised during cold shutdowns. Full-stroke exercising during cold shutdowns for all valves not full-stroke exercised during plant operation shall be on a frequency determined by the intervals between shutdowns as follows: for interval of 3 months or longer, exercise during each shutdown; for intervals of less than 3 months, full-stroke exercise is not required unless 3 months have passed since last shutdown exercise." (Emphasis added) For Unit 1, the licensee has identified by relief request approximately 125 valves whom operation is not practical during plant operation. The above is documented in various relief requests contained in the Unit 1 "Inservice Test Program." The licensee performed part stroke exercise test on the below listed valves.

V-1403 - Normally open
 V-1405 - Normally open
 V-6554 - Normally open
 V-6555 - Normally open
 V-6741 - Normally closed

Notwithstanding the above, both the current Unit 1 Inservice Test Program and the Inservice Test Program submitted to the Commission to be effective February 11, 1988, do not address the part stroke exercise testing of valves which are not practical to full stroke exercise test during plant operations. The licensee indicated that a similar condition exists for the Unit 2 program.

The inspector noted several examples where the current inservice test program for both units do not accurately reflect test frequency or full stroke maximum limiting time values. The inspector noted that all the examples were in the direction of conservatism. The licensee indicated that they had made the necessary corrections in the Unit 1 program which becomes effective February 11, 1988.

The inspector discussed the above with the licensee who indicated that they would review both the Unit 1 program to be effective in February 11, 1988 and the current Unit 2 program, make necessary changes to both, to address the part stroke exercise testing requirement of IWV 3412(a) and correct the inaccurate test frequencies and full stroke maximum limiting times in the Unit 2 program.

The inspector indicated that pending the completion of the licensee's review and the subsequent review, by the NRC, of the amended programs, this matter will be identified as inspector followup item 50-335/87-23-02 and 50-389/87-22-02: "IST Program Inconsistencies."

- (3) ASME B and PV Code, Section XI, Paragraph IWV-3300, requires valves, with remote position indicators, be observed at least every two years, to verify that the valve operation is accurately indicated. The above requirement was confirmed by ASME Interpretation XI-1-79-18 dated December 12, 1979.

Because of a different interpretation of IWV-3300 by the licensee, some Unit 1 valves with remote position indicators have not been observed to verify that the valve operative is accurately indicated. In view of the fact that the revised Unit 1 program, which become effective February 11, 1988, requires all valves in the program with remote position indicators to be observed to verify that the valve operations is accurately indicated, and that all the remotely indicated valves in the program will be so observed during the next refueling outage scheduled for June 1988, no regulatory action was taken.

- (4) ASME B and PV Code Section XI Paragraph IWV-3410(c)(3) 74S75 and IWV-3417(a) 80W81 specify that if for power operated valves, an increase in stroke time of 25% or more from the previous test for valves with full-stroke times greater than 10 sec or 50% or more of valves with full-stroke times less than or equal to 10 sec is observed, test frequency shall be increased to once each month until corrective action is taken, at which time the original test frequency shall be resumed. In any case, any abnormality or erratic action shall be reported.

The inspector noted several examples for valves, with stroke times of less than two seconds, where the stroke time increased by more than 50% and no increased frequency testing was performed because the valves were tested only at cold shutdown. These abnormalities were attributed to the reflex time of the individual performing the test, however no document report was made. The licensee indicated that they were in the process of amending the stroke time test procedure to report times of less than two seconds as "less than two seconds."

- (5) The licensee informed the inspector that they performed stroke time tests by measuring the time between the initiation of the valve by the movement of the switch on the control panel to the completion of the cycle as indicated by the illumination of the final light on the control panel, however they were unable to find this in any of their procedures. The licensee stated that they would add the above to their valve test procedure at its next revision.

Within the areas examined, no deviations or violations were identified except as noted in paragraph 7e(1).

8. Spray Nozzle Flow Verification

a. Background

At the request of the resident inspectors, this inspector inspected the spray nozzle, flow verification test which is required by Unit 1 Technical Specification 4.6.2.1.c and Unit 2 Technical Specification 4.6.2.1.d.

The flow verification was performed by Environmental Thermography and Testing Services Inc. To comply with the Technical Specifications that require the verification of the Containment Building Spray System nozzle flow and subsequent freedom from obstruction, Thermographic Heat Imaging Equipment, was utilized. With an open nozzle, the nozzle and attaching nipple would be heated along the entire length of the assembly by convection from the flowing heated



air, while a blocked nozzle would be heated mainly by conduction, through the metal from the header pipe. Since the thermal conductivity of stainless steel (the parent material for those nozzles) is relatively poor <9 BTH/Hr. -ft-F^o>, the heat losses to the ambient would be sufficient to keep the plugged nozzle at a lower temperature than an open one. The temperature difference between the two conditions would then be detectable by Thermographic Imaging.

The test consisted of heated air supplied to each of the individual header systems feeding the concentric rings located at the top of the Containment Building, via an access port located at the lower portion of the vertical risers that make up this system, the spray nozzles were thermographically scanned with EITS's Real Time Thermal Imaging system IRIS-3, which is capable of detecting a 0.1 degree C. differential across a reference surface at 30 degree Celsius operating ambient temperature. The system has the capability of direct video presentation of the thermal image on an internal CRT screen. The Infra-red Camera was fitted with a 350 mm Germanium Crystal Telephoto Lens System, IRL-3.5, with a 3.5° x 3.5° field of view, so as to obtain maximum definition of each nozzle tip. The IRIS-2 System was equipped with both a hard copy camera, capable of capturing instant permanent photographic evidence of test compliance and results, as well as with direct video input on an auxiliary, compatible VCR recording system, for later replay and computer enhancement of test results. A DIPS (Digital Image Processing System) Computer, utilizing DISCO II software program, was for Unit 1 and will be for Unit 2 utilized to analyze the video recording tape, and produce a quantified image containing the following data: (a) a full color thermal image of the header pipe and related nozzles, with an absolute temperature assigned to each color; (b) an absolute "spot" temperature of each nozzle tip of interest in the Thermogram (heat photo); and (c) an "A" scan line presentation, showing the relative thermal pattern across the horizontal plain of each nozzle tip of interest in the Thermogram.

b. Inspection

The inspection performed by this inspector consisted of the following: review of the FSAR, the Unit 1 Technical Specification 4.6.2.1.C, Unit 2 Technical Specification 4.6.2.1.d, and FP&L Procedure O.P. 0420051, Revision 5 "Containment Spray - Spray Nozzle Air Flow Test"; observation of a portion of the Unit 2 test in progress; and review of the data from the last test performed on Unit 1 (performed November 21-22, 1985).

Within the area examined, no deviations or violations were identified.