



# FPL

DECEMBER 30 1987

L-87-542  
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 335/87-23 and 389/87-22

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

There is no proprietary information in this report.

Very truly yours,

  
C. O. Woody  
Executive Vice President

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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an FPL Group company

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## VIOLATION

During the Nuclear Regulatory Commission (NRC) inspection conducted on October 19-23, 1987, a violation of NRC requirements was identified. The violation involved failure to follow document control procedure by performing safety-related activities with a superseded procedure. 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:

10 CFR 50 Appendix B Criterion V require activities affecting quality be accomplished in accordance with procedures. 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 procedures, thus providing a 30 day grace period prior to the mandatory implemented date.

Contrary to the above, activities were not accomplished in accordance with procedures as evident by the following: four examples were identified where the licensee performed safety-related activities with superseded procedures 48 to 202 days after the mandatory implementation date of the next revision of the procedure.

## RESPONSE

1. Florida Power and Light (FPL) concurs with the violation.
2. Personnel error was the cause for the finding. Responsible control room personnel did not update the procedures as required.
3. During the time period the subject procedures were used (1983), various control room personnel were responsible for updating revisions and informal files were used. In 1984, FPL changed the methods for distributing and filing procedures in the control room. The procedures in the control room are now updated by QC document personnel.
4. FPL believes the present method for updating control room procedures is sufficient to prevent recurrence.
5. FPL is now in full compliance.