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SESSION NBR: 8808030367 DOC. DATE: 88/07/29 NOTARIZED: YES DOCKET #
 FACIL: 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH. NAME AUTHOR AFFILIATION
 CONWAY, W.F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 LIEBERMAN, J. Ofc of Enforcement (Post 870413)

SUBJECT: Responds to NRC 880629 ltr re violations noted in Insp Rept
 50-389/88-06.

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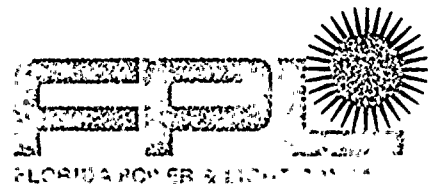
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	OE LIEBERMAN, J		1	1	REG FILE 02		1	1
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JULY 29 1988

L-88-314
10 CFR 2.201

James Lieberman, Director
Office of Enforcement
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Dear Mr. Lieberman:

Re: St. Lucie Unit 2
Docket Nos. 50-389
Inspection Report 389/88-06
Reply to Notice of Violation (EA 88-117)

Florida Power & Light Company has reviewed the Notice of Violation dated June 29, 1988. Pursuant to the provisions of Section 182 of the Atomic Energy Act of 1954, as amended, and 10 CFR 2.201, the attached response supplements information submitted by Licensee Event Report 389/88-03.

Very truly yours,

W. F. Conway
W. F. Conway
Senior Vice President - Nuclear

WFC/GRM/cm

Attachment

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

GRM/001.IR

8808030367 880729
PDR ADOCK 05000389
Q PDC

JE14
||

STATE OF FLORIDA)
) ss.
COUNTY OF PALM BEACH)

W. F. Conway being first duly sworn, deposes and says:

That he is Senior Vice President- Nuclear of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.

W. F. Conway
W. F. Conway

Subscribed and sworn to before me this

29 day of July, 1988.

Robert A. Freeman

NOTARY PUBLIC, in and for the County
of Palm Beach, State of Florida

My Commission expires: Notary Public, State of Florida
My Commission Expires June 1, 1989
Bonded Thru Troy Fair - Insurance, Inc.

VIOLATION

Unit 2 Technical Specification (TS) 3.6.3 requires that containment isolation valves specified in Table 3.6-2 shall be operable in modes 1 through 4 or various actions be taken within 4 to 36 hours to correct the situation or place the unit in cold shutdown.

Contrary to the above, valve I-HCV-2516, a containment isolation valve in the Chemical Volume and Control System (CVCS) letdown line, listed in TS Table 3.6-2, was inoperable in excess of the time limits specified by the TS without the required action being taken. Specifically, on March 13, 1988, with the Plant operating in Mode 1 at 100 percent power, valve I-HCV-2516 was electrically "jumped-open" and effectively rendered inoperable by positioning its "normal/isolate" switch to the "isolate" position. This action bypassed the containment isolation actuation (CIA) and safety injection actuation (SIA) signals to that valve. This discrepancy existed until April 6, 1988, when the condition was discovered and the "normal/isolation" switch returned to the "normal" position.

RESPONSE

1. FPL concurs with the violation.
2. The normal/isolate switch for valve HCV-2516 was placed in the isolate position due to operators misreading the control wiring diagram for the valve. The operators believed that they were only isolating an erroneous D/P signal from a valved out pressure indicating switch. The result, however, was that the valve was also isolated from containment isolation actuation system (CIAS) and safety injection actuation system (SIAS) signals. It should be noted, however, that two additional valves (V-2515 and V-2522) were capable of isolating the letdown line.
3. During a control board walkdown, a Reactor Operator trainee checking the status of HCV-2516 discovered that the switch apparently isolates the CIAS and SIAS signals. He informed the Shift Supervisor of his concerns. The Operations Supervisor was notified and the valve was declared out of service per TS Action Statement 3.6.3.a. (4 hour LCO). Verification of the actual valve status was made by Plant Staff and a jumper to electrically eliminate the D/P signal was installed. The normal/isolate switch for HCV-2516 was returned to normal. This action enabled the CIAS and SIAS signals to HCV-2516 and cleared the Action Statement. A retest of the closure capability of HCV-2516 on CIAS and SIAS signal was subsequently performed.

Additionally, the event was reviewed with responsible

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personnel to cover details involved. An Operations Night Order was issued giving specific guidance regarding the removal of any Plant component from service including what type of assessment must be performed.

4. (a) Administrative controls have been established for normal/isolate switches. Plant procedure "Administrative Control of Valves, Locks, and Switches" has been revised to include normal/isolate switches. This will require the permission of the Nuclear Plant Supervisor or the Assistant Nuclear Plant Supervisor to change the position of normal/isolate switches and the logging of any switches that are out of normal position, either in the Deviation Log or in the Plant Equipment Clearance Order Log.
 - (b) Caution placards have been placed locally to remind operators of loss of CIAS/SIAS function when normal/isolate switches are placed in the isolate position.
 - (c) Annunciator response procedures have been revised to include reference to CIAS and SIAS signals when normal/isolate switches are placed in the isolate position.
 - (d) Specific training on the impact of repositioning normal/isolate switches will be incorporated into Licensed Operator Initial Training and Requalification Training.
5. Item 4d should be complete by December 31, 1988. All other corrective actions listed have been completed.