

ENCLOSURE 1

NOTICE OF DEVIATION

Florida Power and Light Company
St. Lucie Units 1 and 2

Docket Nos.: 50-335 and 50-389
License Nos.: DPR-67 and NPF-16

Based on the results of an NRC inspection conducted on March 31 and April 11 - 19, 1988, a deviation from your commitments to the NRC was identified. The deviation consisted of failure to include RCP NPSH requirements in EOPs. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the deviation is listed below:

NRC Generic Letter 82-33 (GL 82-33) required that licensees develop basic emergency response capabilities including the upgrade and implementation of emergency operating procedures (EOPs) using an NRC approved procedures generation package. NUREG 0899 provides guidance and an acceptable method of developing plant-specific technical guidelines and a writer's guide. NUREG 0899 further provides that the licensee's plant-specific guidelines should be based on the generic guidelines provided by the licensee's owners group and the deviations from the generic guidelines should be fully documented and justified.

By letter dated April 15, 1983, the licensee committed to implement the improvements in their emergency response capabilities. They further committed to conform with the guidance provided by NUREG 0899 and the owner group's generic guidelines (CEN-152).

In deviation from the above, the following discrepancies were found (389/88-08-01):

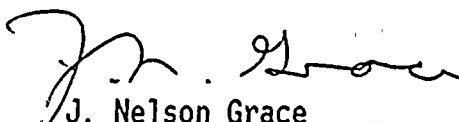
- A. CEN-152 specifies an RCP NPSH curve in a figure entitled "typical post-accident pressure-temperature limits," which was included in many sections of the guidelines. The St. Lucie EOPs, with few exceptions, did not include the RCP NPSH requirements. This omission may cause the operator to violate NPSH limits resulting in damage to RCPs and the subsequent degrading of the postaccident RCS heat removal capability of the plant.
- B. The licensee failed to (1) provide information on the assumptions used to adapt the generic guidelines to the St. Lucie plants, (2) provide a description of how the St. Lucie plants differ from the generic plant, and (3) provide the technical basis and/or justification for significant differences between the generic guidelines (CEN-152) and the St. Lucie procedure generation package.

Florida Power and Light Company
St. Lucie Units 1 and 2

2 Docket Nos.: 50-335 and 50-389
License Nos.: DPR-67 and NPF-16

Please provide to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, St. Lucie, in writing within 30 days of the date of this Notice, the reasons for the deviations, the corrective steps which have been taken and the results achieved, the corrective steps which will be taken to avoid further deviations, and the date when your corrective action will be completed. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION


J. Nelson Grace
Regional Administrator

Dated at Atlanta, Georgia,
this 26th day of August 1988