







P.O. Box 14000, Juno Beach, FL 33408-0420

APRIL 3 1989

L-89-129  
10 CFR 2.201

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

Re: St. Lucie Unit 1  
Docket No. 50-335  
Inspection Report 89-02  
Reply to Notice of Violation

Florida Power & Light Company (FPL) has reviewed the subject inspection report, and pursuant to the provisions of 10 CFR 2.201, the response is provided as Attachment A. In addition, FPL confirms the commitments documented in paragraph 2.c. of the subject Inspection Report.

Very truly yours,

  
W. F. Conway  
Senior Vice President - Nuclear

WFC/JRH/cm

Attachments

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, St. Lucie Plant

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Attachment:  
Docket Nos. 50-335  
Inspection Report 89-02

RESPONSE TO NOTICE OF VIOLATION

VIOLATION

10 CFR 50, Appendix B, Criterion V requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstance and shall be accomplished in accordance with these instructions.

1. Contrary to the above, during the period from September 1986 to January 23, 1989, the licensee failed to calibrate the safety-related Neutron Flux Channel 26-80A according to I&C Procedure No. 1-1240065 and the preventative maintenance program.
2. Contrary to the above, during the period from September 1986 to February 24, 1988 and from May 1988 to January 23, 1989, the licensee failed to calibrate the safety-related Neutron Flux Channel 26-80B according to I&C Procedure No. 1-1240065 and the preventative maintenance program.
3. Contrary to the above, during the period from November 1985 to January 22, 1989, the licensee did not have a specific calibration procedure requiring calibration and did not list the following important to safety High Pressure Safety Injection flow loops FT-3313, FT-3323, FT-3333 and FT-3343 in the preventative maintenance tracking system. Consequently, these instrumentation flow loops have not been calibrated since November 23, 1985.

RESPONSE TO VIOLATION

1. Florida Power and Light Company (FPL) concurs with the violation.
2. For Item 1 and 2 above, the procedures were issued; however, the scheduling system was not updated to include the required calibrations. For Item 3, these instruments were overlooked during development of necessary procedures for Regulatory Guide 1.97 implementation.
3. The instruments identified in the violation were calibrated prior to the NRC inspectors departing the site. In addition,

FPL reviewed Regulatory Guide 1.97 instrument lists for completeness, and verified by independent review, those instruments requiring periodic preventative maintenance. FPL is now evaluating the items identified to determine the appropriate checks or tests.

4. Additional management controls will be placed in effect to further coordinate activities and scheduling techniques for maintenance on Regulatory Guide 1.97 and environmentally qualified equipment.
5. The required maintenance and controls discussed above are expected to be complete by September 15, 1989.

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