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SUBJECT: Responds to violations noted in Insp Repts 50-335/89-16 & 50-389/89-16.

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

SEPTEMBER 1 5 1989

L-89-343
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 89-16
Response to Notice of Violation

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

Very truly yours,

J. Scarola for

C. O. Woody
Acting Senior Vice President - Nuclear

COW/GRM/cm

Attachment

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

IE01
1/1

Re: St. Lucie Units 1 and 2
Inspection Report 89-16
Response to Notice of Violation

VIOLATION

10 CFR 50, Appendix B, Criterion III, as implemented by FPL Topical Quality Assurance Report 1-76A, Rev. 15, TQR 3.0, requires that design inputs be specified and correctly translated into design input documents.

ANSI Standard N45.2.11 - 1974, Section 3, invoked by the topical report appendix C, echoes this requirement. ANSI N45.2.11 Section 3.2 further requires that design inputs include: Loads, such as seismic, wind, thermal, and dynamic; Mechanical Requirements, such as vibration, stress, shock, and reaction forces; Structural Requirements covering such items as equipment foundations and pipe supports; and Interface Requirements including definition of the functional and physical interfaces involving structures, systems and components. ANSI N45.2.11 Section 4 further requires that methods shall provide for relating the final design back to the source of design input, that this be traceable, and that the design activities be documented in sufficient detail to permit certain verification and auditing.

ANSI Standard N18.7 - 1976, which is also invoked by the topical report appendix C, requires proper completion and inspection of design changes.

Contrary to the above:

- In some cases, proper design inputs had not been considered or had not been translated into output documents for the adequate mounting of compressed gas cylinders in safety-related equipment areas and for the protection of safety-related components such as the main steam isolation valves, refueling water tank appurtenances, and main feed isolation valves from missile effects of damaged compressed gas cylinders.

- In some cases, the design process had been ignored or the design was not implemented by the resulting modification.

Response

1. Florida Power and Light concurs with the violation.

2. Design drawings and documentation for the 2A Emergency Diesel Generator Building Fire Protection System disclosed that details regarding the location and mounting of compressed gas (nitrogen) cylinders used to pressurize the sprinkler system were not provided to the constructor during installation of the system.

Design drawings and documentation for the 1B Emergency Diesel Generator Fire Protection System disclosed that PC/M 99-80 provided design details regarding the location and installation of the nitrogen cylinders used for pressurizing the sprinkler system. The design drawings and documents require the installation of the nitrogen cylinders on the outside of the diesel generator building in accordance with a seismically designed configuration. Installation of the cylinders was not completed in accordance with the design. FPL considers this an isolated occurrence.

FPL can find no specific details for the design of the CO_2 fire extinguisher brackets. FPL has conducted a preliminary evaluation of CO_2 fire extinguisher brackets. The results of this evaluation indicate that no missile hazard is created during a seismic event.

Maintenance personnel did not consider that temporary use of gas bottles for extended periods of time constituted a design change.

3. The restraining bracket for the 2A EDG Building nitrogen cylinder has been modified to ensure that the cylinder is not dislodged during a seismic event.

The nitrogen cylinder in the 1B EDG Building has been removed from within the diesel building and has been reinstalled in a seismically designed restraining bracket outside the 1B EDG Building.

Mechanical Maintenance removed the compressed gas cylinders from safety-related areas to eliminate potential missile hazards.

Maintenance personnel have been instructed to ensure that gas cylinders are properly capped and stored after use.

4. No further actions are considered necessary for the 2A and 1B diesel fire protection nitrogen gas bottle.

A PC/M package is currently being developed to replace all hook type brackets supporting portable CO_2 fire extinguishers with more secure strap-type brackets.

5. The 2A EDG Building cylinder bracket was modified by September 1, 1989.

The nitrogen cylinder was removed from within the 1B EDG Building and re-installed outside on June 27, 1989.

The CO_2 fire extinguisher bracket modification is expected to be complete by June 1990.