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 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH. NAME AUTHOR AFFILIATION
 ALDBERG, J.H. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC ltr re violation noted in Insp Repts
 50-335/89-20 & 50-389/89-20.

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 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

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OCTOBER 20 1989

L-89-384
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 89-20
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. H. Goldberg
Executive Vice President

JHG/JRH/GMP

Attachment

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

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ATTACHMENT

FINDING A:

Units 1 and 2 Technical Specifications (TS) 6.8.1.a require that written procedures shall be established, implemented and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, paragraph 1.c., includes procedures for equipment control (e.g., locking and tagging). This is implemented by Florida Power and Light Company's Administrative Procedures 0010123, Administrative Control of Valves, Locks and Switches for Units 1 and 2. The Unit 1 procedure, Revision 63, requires the 1B diesel fuel oil transfer pump discharge valve V17215 to be locked open or specifically controlled using the Valve, Switch Deviation Log. This requirement supports Unit 1 Technical Specification 3.8.1.1.b.3., which requires an operable diesel fuel oil transfer pump.

Contrary to the above, on June 14, 1989, valve V17215 was found to have been locked shut for an indeterminate period. Manipulations of this valve had not been controlled using the Valve, Switch Deviation Log as required.

RESPONSE:

1. FPL concurs with the finding.
2. The cause of the finding was personnel error, in an operator's failure to obtain permission to reposition the valve, and in the use of an inadequate method to determine the valve's position.
3. Valve V-17215 was immediately returned to the open position. Verification of other diesel fuel oil valves for proper position was accomplished on both St. Lucie units.
4. Operations personnel were counselled on the requirements of applicable procedures. Future weekly verification of locked valves will use a hands-on approach. A review of Administrative Procedure 0010123 was included in the current cycle of Non-Licensed Operator requalification.
5. All corrective actions have been completed. No additional corrective actions are required.

FINDING B:

Units 1 and 2 Technical Specifications (TS) 6.8.1.a require that written procedures shall be established, implemented and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, paragraph 3.f.(4), includes procedures for startup, shutdown, and changing modes of operation of the containment cooling system. This is implemented by Units 1 and 2 procedures 2000020, Revision 2, Containment Cooling System Operation.

During the period from April 10 to August 14, 1989, Units 1 and 2 procedures 2000020, Revision 2, were found to be inadequate in that they did not control the dogging of the fan cooler access doors and did not control the use of filter media to cover the cooler coils. The fan cooler access doors were found not properly dogged on both units and the Unit 1 fan cooler coils had been covered with filter media during unit operation since 1987. Operations with the doors not properly dogged and the filter media over the fan cooler coils was not analyzed at that time.

RESPONSE:

1. FPL concurs with the finding.
2. The cause of this finding was inadequate management oversight of containment close-out inspections. Incomplete instructions on work documents were a contributing cause.
3. The Containment Fan Cooler access doors were properly secured on both St. Lucie units, and the filter media was removed from Unit 1 Containment Fan Coolers.
4. Administrative Procedure 0010728, "Post Outage Review" has been revised to include verification of containment restoration prior to unit startup. Anomaly Inspection Procedures (AP 1 & 2 0010125) will be revised to verify containment cooler doors are properly secured. The containment fan cooler doors have been stenciled to read "Close and latch all dogs upon completion of work." The Unit 1 Containment Cooler technical manual has been revised to include instructions to remove roughing filters prior to power operation.
5. The corrective actions of paragraph 4. will be completed by December 31, 1989.