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SUBJECT: Responds to violations noted during insp of Licenses DPR-57 & NPF-16. R

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DECEMBER 13 1989

L-89-440  
10CFR 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 89-23  
Reply to a Notice of Violation

Florida Power & Light Company has reviewed the subject inspection report, and pursuant to the provisions of 10 CFR 2.201, the response is attached. Based on a discussion with NRC Region II Staff the response date was revised to December 13, 1989.

Very truly yours,

J. H. Goldberg  
Executive Vice President

JHG/JRH/rh

Attachment

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

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Q PNU

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VIOLATION A:

Unit 1 Technical Specification 6.8.1.a. requires 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 7.a., recommends procedures for the liquid radioactive waste system including "demineralizing". Appendix "A" paragraph 3.n., recommends procedures for the chemical and volume control system, which contains some of the ion exchangers addressed in the subject procedure. These were implemented in-part on site by operating procedure OP 1-0520020, Radioactive Resin Replacement, which provided instructions for resin replacement on various ion exchangers, including the 1D waste ion exchanger.

Contrary to the above, on August 20, 1989, the licensee failed to implement the above procedure. The procedure was signed as being complete for the 1D waste ion exchanger; however, the resin fill funnel was left installed on the resin fill isolation valve flange and exposed to the weather until September 8, 1989, when it was discovered by an NRC inspector. The fill isolation valve, which was a potential unmonitored radioactive release point, is located in a shallow trench on the auxiliary building roof. This fill station, as shown by diagrams in the Final Safety Analyses Report, would normally be sealed after resin filling by a bolted and gasketed blank flange and would also be protected by a bolted metal trench cover.

Subsequent procedure review showed that the procedure was also inadequately established. It did not adequately address funnel installation/removal; blank flange removal, temporary storage, or reinstallation; stowage instructions for the potentially contaminated funnel; nor did it provide adequate management control of departmental interfaces during the process.

RESPONSE A:

1. Florida Power & Light concurs with the violation.
2. The cause of the violation was personnel error and inadequate procedure. The procedure being implemented did not provide the specific actions to be accomplished when resin replacement was complete.
3. The resin fill funnels were removed, gasketed flanges installed and the metal trench covers were replaced.
4. Operating Procedures 1-0520020 and 2-0520020 will be revised to provide the interdepartmental controls for the installation and removal of the resin fill funnels and blank flanges.
5. Corrective actions are scheduled to be completed by February 1, 1990.

VIOLATION B:

Units 1 and 2 TS 6.8.1a 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 9.a includes procedures for maintenance of safety-related equipment. This requirement was implemented in part by procedures 1-M-0018 and 2-M-0018, Mechanical Maintenance Safety-Related Preventive Maintenance (PM) Program, that implemented PM requirements on the strainers for the bearing lubricating water for the Unit 1 and 2 intake cooling water (ICW) pumps.

Contrary to the above, the subject procedures were inadequately established in that they did not provide appropriate inspection guidance concerning self-cleaning strainers and y-type strainers in the bearing lubricating water systems for the ICW pumps. The procedures did not provide strainer inspection acceptance criteria, service limits, or repair specifications. The lack of inspection guidance allowed a change in strainer mesh size to go unquestioned and excessive deterioration of self-cleaning strainers to be unrecognized. The change in strainer mesh size was a major contributor to 1A ICW pump bearing failures caused by y-type strainer blockage.

RESPONSE B:

1. Florida Power & Light concurs with the violation.
2. The cause of the violation was an inadequate procedure. The inspection acceptance criteria, service limits, and spare parts information were not provided in the ICW pump bearing lubricating water system preventative maintenance activities. (PM file numbers 153, 154, 155, and 156 for Unit 1 and PM file numbers 00501, 00502, 00503, and 00504 for Unit 2). These activities are specified in the Mechanical Maintenance Safety-Related Preventive Maintenance Program Procedures (1-M-0018 and 2-M-0018).
3. The preventative maintenance (PM) activities for the ICW pump bearing lubricating water system specified in procedures 1-M-0018 and 2-M-0018 have been revised to provide the inspection acceptance criteria, repair guidelines and spare parts information.

4. The maintenance department will review a representative sample of other PMs in procedures 1-M-0018 and 2-M-0018 to determine if the inspection acceptance criteria, repair guidelines and spare parts information are included. Based on the results of this review the corrective actions specified in item 3 above will be expanded to include additional PM activities as warranted. This review is scheduled to be completed by January 31, 1990.
  
5. Item 3 above was completed on October 30, 1989.

