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 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.      05000389

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 GOLDBERG, J.H.      Florida Power & Light Co.  
 RECIPIENT NAME      RECIPIENT AFFILIATION  
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SUBJECT: Responds to violations noted in Insp Rept 50-335/89-29 & 50-389/89-29.

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FEBRUARY 22 1990

L-90-71  
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 89-29  
Response to 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.

Very truly yours,

*J. H. Goldberg by RGA*

J. H. Goldberg  
Executive Vice President  
Nuclear Energy

JHG/GRM/slh

Attachment

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

9003020142 900222  
FOR ADCK 05000335  
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ATTACHMENT  
RESPONSE TO NOTICE OF VIOLATION

VIOLATION:

Title 10 Code of Federal Regulations, Part 50, Appendix B Criterion V requires, in part, that activities affecting quality shall be prescribed by documented instructions or procedures of a type appropriate to the circumstances. Instructions, and procedures shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. Florida Power and Light procedure PR/PSL-1, Revision 13, "Control of Purchased Material, Equipment, and Services," paragraph 5.10. requires the St. Lucie Plant Site Coordinator to approve material used on safety related work performed by contractors to ensure proper quality level, and to provide adequate supervision of the work. Florida Power and Light Administrative Procedure No. 0010432, Revision 39, "Nuclear Plant Work Orders," paragraph 8.6 requires, in part, "When parts or materials are used, attach all ROS forms and/or QC tags to the NPWO package....."

Contrary to the above, the following was found as listed below:

Unit 2 Limitorque actuators MV-09-09, and MV-09-10 failed to operate as designed when called upon to do so September 23, 1989, following a manual reactor trip and the subsequent receipt of an Auxiliary Feedwater Actuation System (AFAS) signal. Valves MV-09-09 and MV-09-10 are at the discharge of the Unit 2 motor driven auxiliary feedwater pumps, 2a and 2b, respectively.

- o MV-09-09 failed to operate as designed because of severe galling between the upper stem and stem nut, due to inadequate lubrication. The valve went full-open following receipt of the AFAS signal, however, operators could not close the valve remotely or locally. General Maintenance Procedure Number 2-M-00180, revision 5 PM File 10500 covers the 18 month inspection and lubrication of Limitorque actuators. Valve stem lubrication is covered in section 4.8 of the procedure, and the instructions are to "Clean the valve stem with kerosene and rags; apply a coat of anti seize lubricant." These instructions are inadequate because they do not ensure an even coating of lubricant will be applied to the entire valve stem, including the portion of the valve stem in contact with the actuator stem nut.

- o MV-09-10 failed to operate as designed due to a worn limit switch pinion drive gear. The result was the valve could only move in the closed direction, after initially being opened by the AFAS signal. The root cause was due to the installation of an unauthorized handwheel cover gasket which was 0.116" thick, resulting in improper meshing of the limit switch pinion and drive sleeve bevel gears. The proper gasket thickness should have been 0.015". The licensee was unable to determine when the unauthorized gasket was installed, or account for the use of the gasket material it was cut from, in violation of the requirements to account for material and parts used on safety related work. The licensee did not provide adequate and complete work procedures for proper Limitorque disassembly/assembly, and the vendor technical manuals in use at the time were not updated. The most recent vendor technical manual for Limitorque actuators, SMBI-82C was available in 1982. The SMBI-82C technical manual contains instructions for determining the proper thickness of the handwheel cover gasket; the SMBI-170, issued in 1979, and in use during the time the unauthorized handwheel gasket was installed (between 1984 and 1989) did not contain instructions for determining proper handwheel gasket thickness.

RESPONSE TO VIOLATION:

1. Florida Power & Light concurs with the violation.
2. The reason for the violation was lack of detail in "Limitorque" maintenance procedures and failure to follow procedures.
3. Florida Power & Light has shifted responsibility for all "Limitorque" maintenance to one department at the St. Lucie Plant and counselled personnel in adherence to procedures. A technical review of all contractor implemented "Plant Work Orders" was performed.
4. Maintenance instructions for all "Limitorque" actuated valves have been written or revised to incorporate manufacturers instructions and industry guidelines. Technical support engineers perform a technical review of contractor related "Plant Work Orders" to ensure compliance to design specifications.
5. Compliance has been achieved as of February 16, 1990.