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 AUTH. NAME AUTHOR AFFILIATION
 GOLDBERG, J.H. Florida Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to violations noted in Insp Repts 50-335/89-24 & 50-389/89-24.

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FEBRUARY 22 1990

L-90-72
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 89-24
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
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

9003060115 900222
PDR ADOCK 05000335
Q PIC

ATTACHMENT
RESPONSE TO NOTICE OF VIOLATION

VIOLATION A:

Title Ten Code of Federal Regulation (10 CFR), Part 50, Appendix B, Criterion V, requires activities affecting quality be accomplished in accordance with procedures. 10 CFR, Part 50, Appendix B, Criterion XVII, requires sufficient records be maintained to furnish evidence of activities affecting quality. American National Standards Institute (ANSI) N45.2.9 - 1974, paragraph 3.2.1 specifies that Quality records are to be legible, completely filled out and adequately identifiable. The preceding requirements are implemented by Florida Power and Light Procedure QI 17-PR/PSL-1, Revision 14, "Quality Assurance Records", Paragraphs 5.1.C, 5.2.2 and 5.2.7 which require that records, both hard copies and microfilm, be reviewed for completeness and legibility, and readability.

Contrary to the above, on November 3, 1989, activities affecting quality had not been accomplished in accordance with procedures, which resulted in incomplete and illegible records of activities affecting quality in that the final quality records (microfilm) for seven Plant Work Order packages out of ten examined contained missing dates, missing signatures, illegible data, and illegible signatures.

RESPONSE TO VIOLATION A:

1. Florida Power & Light concurs with the violation.
2. The reason for the violation is personnel failure to pay attention to detail upon completion and review of Plant Work Order documentation.
3. Florida Power & Light has reviewed the specific items as well as additional Plant Work Orders and has found no safety concerns. These items were considered administrative in nature and, as such, specific corrective action to obtain the missing signatures and dates is not warranted.
4. Florida Power & Light has changed the applicable procedure to clarify which spaces and blocks are required to be completed on the Plant Work Order. In addition, the Quality Control (QC) Supervisor has counselled his personnel on ensuring that the proper documentation is obtained prior to QC approval. Each maintenance discipline has been instructed to ensure the Plant Work Order has been properly completed before submitting to QC for review.
5. The above action has been completed as of February 12, 1990.

VIOLATION B:

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

Contrary to the above, on October 3, 1989 activities affecting quality were not in accordance with drawings in that:

1. Unit 1 Excore Neutron Flux Panel RY2680B printed circuit board protective enclosure was not installed (missing) as required by Gamma Metrics drawing 200646.
2. Power supply assembly bottom protective covers for Unit 1 Reactor Protection System Panels MB, MC and MD were not installed as required by EE Controls Drawings D-10089.
3. Two 120 VAC Instrument Bus 2MC Distribution Panel fuses, FU-3, required by control wiring diagram CWA-2998-B-327, sheets 1009 and 1636, were missing. The fuses are part of the power monitoring logic circuit for the Auxiliary Feedwater Actuation System.

RESPONSE TO VIOLATION B:

1. Florida Power & Light concurs with the violation.
2. Personnel failed to fully restore equipment during tests and checks.
3. Immediate corrective action was taken to correct the specific deficiencies except the dust covers in the reactor protection drawers. The absence of dust covers on the reactor protection system has been evaluated by FPL and found to be an acceptable interim plant configuration. New covers are on order and expected to be installed by August 1990.
4. Supervisory personnel have been directed to ensure all restoration work is complete at the end of the job. In addition, walkdowns have been conducted by supervisors to identify and correct similar type deficiencies.
5. Full compliance has been achieved except for the covers noted above, which is expected to be completed by August 1990.

1-1

