

NOTICE OF VIOLATION

Florida Power & Light Company
St. Lucie Unit 2

Docket No. 50-389
License No. NPF-16

During the Nuclear Regulator Commission (NRC) inspection conducted on January 9 - February 12, 1990, violations of NRC requirements were identified. The violations involved failure to properly implement the Unit 2 startup procedure, failure to establish a preventive maintenance program for the 2C auxiliary feedwater pump governor, and failure to seismically remount a Unit 2 atmospheric dump valve. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Action," 10 CFR Part 2, Appendix C (1989), the violations are listed below:

- A. Unit 2 Technical Specification (TS) 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. Paragraph 2.e includes procedures for turbine startup and generator synchronization. Paragraph 2.f includes procedures for changing load and load follow.

Procedure OP 2-0030124, Rev 31, Turbine Start-Up Zero to Full Load, section 8.19, required that the second condensate pump be started at approximately 400 Megawatts (MW) and section 8.20 required that the second Main Feed Pump be started at approximately 420 MW.

Contrary to the above, on January 14, 1990, when power levels were at approximately 400 MW, operators failed to implement procedure OP 2-0030124, Rev 31, Turbine Start-Up Zero to Full Load, sections 8.19 and 8.20, by not attempting to start the second condensate pump until a low main feed pump suction pressure alarm prompted them. As a result of this failure to follow procedure, the operating main feed pump tripped on low suction pressure. The reactor subsequently tripped, at approximately 470 MW reactor power, from low steam generator water level.

This is a Severity Level IV violation (Supplement II).

- B. Unit 2 Technical Specification (TS) 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 9.a, includes maintenance that can affect the performance of safety-related equipment. Paragraph 9.b discusses preventive maintenance schedules, including schedules for lubrication and for inspection of equipment.

FPL-approved vendor technical manual 2998-12474, Rev 6, Auxiliary Feed-water Pump, Tab 6, contains recommendations for use of certain solvents to flush the governor to correct erratic operation, recommendations

9003210038 900314
PDR ADOCK 05000335
Q FDC

concerning changing oil at 6 month maximum intervals, and procedures for filling and venting the governor.

Contrary to the above, the licensee failed to establish a preventative maintenance program, nor did they schedule preventive maintenance for the 2C auxiliary feedwater pump governor. The governor oil system had not been flushed since initial startup prior to 1983. Following 2C auxiliary feedwater pump surveillance testing failures on January 13, 1990, the governor oil system was flushed as directed by Nuclear Plant Work Order 7649/62, and passed subsequent surveillance testing. On January 14, 1990, the 2C auxiliary feedwater pump failed to properly start and operate following a reactor trip. On January 15, after additional flushing of the governor oil system, the pump passed the surveillance test; however, it failed to start from ambient conditions.

Subsequently, following the flush process and using a solvent recommended by FPL-approved vendor technical manual 2998-12474, Rev 6, Auxiliary Feedwater Pump, Tab 6, the proximate cause was found to be suspended solids in the governor oil.

This is a Severity Level IV violation (Supplement II).

- C. Unit 2 Technical Specifications (TS) 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 9A, includes maintenance that can affect the performance of safety-related equipment. Unit 2 Main Steam System flow Diagram 2998-G-079, Sheet 1, described that Motor Operated Atmospheric Dump Valve MV 08-18A as a safety-related, seismically qualified valve.

Contrary to the above, on January 3, 1990, a specific procedure for disassembly/reassembly of the motor operator to the valve was not in effect. The vendor manual in use did not address required limits for bolt torque for the dump valve bolted connection. The generic torque table in use addressed allowed torque values for a higher grade cap screw than those used. As a result, the motor operator for valve MV 08-18A was remounted to the transition plate and valve using a torque value exceeding that specified by the valve vendor. This resulted in the valve being returned to service with the mounting bolts in an overstressed condition.

This is a Severity Level IV violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, the Florida Power & Light Company is hereby required to submit a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, St. Lucie, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of




Florida Power & Light Company
St. Lucie Unit 2

3

Docket No. 50-389
License No. NPF-16

Violation" and should include for each violation: (1) admission or denial of the alleged violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

FOR THE NUCLEAR REGULATORY COMMISSION


Luis A. Reyes, Director
Division of Reactor Projects

Dated at Atlanta, Georgia
this 14th day of March 1990

