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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.
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SUBJECT: Responds to NRC ltr re violations noted in Insp Repts
 50-335/90-02 & 50-389/90-02.

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L-90-138
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 90-02
Response to Notice of Violation

Florida Power & Light Company (FPL) 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

JHG/GRM/sh

Attachment

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

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PDR ADCK 05000335
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Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Inspection Report 90-02
Response to Notice of Violation

FINDING 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.

RESPONSE:

1. FPL concurs with the violation.
2. The reason for the violation was personnel error on the part of the shift operating crew.
3. a. Shift supervision has been counseled on the importance of attention to detail and procedure compliance.
b. The procedure in use at the time of the event, Turbine Start-Up Zero to Full Load OP 1(2)-0030124, has been revised to:
 - (1) require that the power ascension be stopped at 315 MW (35%) and the second condensate pump be started prior to continuing;

(2) require that the power ascension be stopped at 420 MW (45%) and the second feedwater pump be started prior to continuing.

c. An Operations Department Standing Night Order has been issued which includes the following:

(1) The Nuclear Plant Supervisor (NPS) is expected to remain in the control room during any significant changes in power level

(2) During plant start-ups, turbine rolls and initial power escalation to 100%, a second, experienced supervisor in operations will be present in an advisory capacity to the on-shift NPS

(3) When a shift change is due and an evolution such as reactor start-up, turbine roll or major power level change is in progress, that evolution will be halted during the turnover period. Once the oncoming crew has assumed the shift, a briefing of the evolution and its major milestones will be held by the NPS/ANPS

4. The corrective steps described above are expected to prevent further violations of this nature. Additionally, operations supervision will continue to stress the need for pre-evolution briefings and the requirements for procedural compliance.

5. Corrective action is complete.

FINDING 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 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 preventative 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.

RESPONSE:

1. FPL concurs with the violation.
2. The reason for the violation was incomplete implementation of appropriate vendor preventative maintenance, i.e., oil change in speed governor.
3. The specific vendor recommendation regarding the speed governor oil change was completed. The specific procedures were changed to reflect the oil changes at a frequency consistent with the vendor's recommendation.



4. As stated in your report, this item was considered a repeat of a similar violation regarding inadequacy of the preventative maintenance (PM) program. Although FPL does not consider these items to be repeat or similar, we do agree that the specific PM's were not adequate to determine if the component was degraded. FPL is in the process of reviewing all mechanical maintenance PM's to ensure adequacy of the procedure and inclusion of appropriate vendor recommendations.
5. Corrective action is expected to be complete by December 1990.

FINDING 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.

RESPONSE:

1. FPL concurs with the violation.
2. The reason for the violation was no maintenance procedure was in place.
3. The overtorqued bolts were removed and replaced. The replacement bolts were torqued to the vendor's recommendation.
4. Maintenance Procedure MP 0950064 covering this size actuator is now in place. Actuator to valve yoke torquing requirements are included in the procedure.
5. Corrective action is complete.