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 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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 GOLDBERG, J.H. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to violations noted in Insp Repts 50-335/90-13 & 50-389/90-13.

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L-90-250
10 CFR 2.201

JULY 09 1990


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 90-13
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
President
Nuclear Division

JHG/JWH/lg

Attachment

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

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Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Inspection Report 90-13
Response to Notice of Violation

VIOLATION:

10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, as implemented by approved FPL Topical Quality Assurance Report TQAR 1-76A, Rev. 15, TQR 5.0, Instructions, Procedures, and Drawings, and further implemented by TQAR Appendix C commitment to ANSI N18-7, 1976, paragraph 5.2.7, Maintenance and Modifications, require that maintenance or modifications which may affect functioning of safety-related structures, systems, or components shall be performed in a manner to ensure quality at least equivalent to that specified in original design bases and requirements, materials specifications, and inspection requirements.

Contrary to the above, in the three examples cited below, the licensee failed to maintain the quality specified in the original design requirements or materials specifications.

1. Seismic drawing 8770-G-796, sheet 3, shows the seismic support for the Unit 1 maintenance hatch drawbridge inside containment to be a pair of 3 x 3 inch angle supports about 7 feet long and bolted to the drawbridge and adjacent deck. During a containment tour in preparation for Unit 1 startup, the raised drawbridge at the equipment hatch was not supported by the specified supports. It was supported by a chainfall.
2. The maintenance organization removed the existing seismic mounting fasteners for the hydrogen sampling system containment isolation valves FSE-27-1 through 7 and, when unable to determine the existence of approved drawings, informally designed and installed significantly different mounting fasteners without design engineering involvement. The approved but unissued drawings when located supported the original fastener installation.
3. Carbon steel nuts were installed on the joint between the 1A ICW pump casing to pump stuffing box in lieu of 316 stainless steel nuts required by Ebasco Specification 53-47. In addition, a single rubber gasket was installed on the safety-related lubricating water flanged joint in lieu of an insulation kit required by drawing 8770-B-124, CW 53, Rev 1, Circ. Water System.

RESPONSE (ITEM 1)

1. Florida Power & Light concurs with the violation.
2. The most probable cause of the violation was an oversight during the implementation of General Maintenance Procedure M-0311, "Equipment Access, Hatch - Opening and Closing" and inadequate procedural instructions.



RESPONSE (ITEM 1) Continued

3. The maintenance hatch drawbridge braces were immediately re-installed to the originally designed configuration prior to power operations.
4. To prevent recurrence, General Maintenance Procedure M-0311 will be revised to explicitly identify the drawbridge brace installation during equipment hatch closing.
5. Corrective Action (procedure revision) is expected to be complete by August 10, 1990.

RESPONSE (ITEM 2)

1. Florida Power & Light concurs with the violation.
2. The cause of the violation was that the installation detail drawing did not adequately reflect a modified valve mounting configuration which came as a result of a plant change modification.
3. Plant Design Engineering was requested to review the configuration details further which identified the plant modification. Details of the modified valve mounting configuration were provided and the supports were returned to design configuration.
4. To prevent recurrence, a Design Change Request is in preparation to provide the approved mounting configuration for the hydrogen sampling system containment isolation valves on the system installation detail drawing.
5. Corrective action is expected to be complete by August 10, 1990.

RESPONSE (ITEM 3)

1. Florida Power & Light concurs with the violation.
2. The cause of the violation has been determined to be personnel error. In the case of the flange installation, maintenance personnel failed to verify the design configuration requirements. In the case of the stuffing box nuts, documentation indicates the correct nuts were requested and issued to the maintenance personnel; however, the wrong nuts were installed.
3. The proper bolting material was obtained and installed on the joint between the 1A ICW pump casing to pump stuffing box, and the required insulation kit was installed at the flanged joint.
4. To prevent recurrence, maintenance personnel have been counseled and are aware of the importance of verifying the design configuration requirements and ensuring the required materials issued from stores are the materials used during installation.
5. Corrective action is complete at this time.