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 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH. NAME AUTHOR AFFILIATION
 SAGER, D.A. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Corrects 901121 response to violations noted in Insp Repts
 50-335/90-23 & 50-389/90-23. Corrective actions re maint
 personnel training on revised matl control procedures will
 be completed by 910228.

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FPL

P.O. Box 128, Ft. Pierce, FL 34954-0128

December 20, 1990

L-90-455
10 CFR 2.201

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: St. Lucie Unit Nos. 1 and 2
Docket Nos. 50-335 & 50-389
Correction of Typographical Error in
the Response to Notice of Violation
Inspection Report 90-23

Florida Power and Light Company has identified a typographical error in the response to the subject violation submitted by FPL letter L-90-392 on November 21, 1990. The letter incorrectly stated in section 5.e of the response that corrective action 4. b. (3) would be complete by February 28, 1990. The corrective action statement should have read the action will be complete by February 28, 1991. Attached please find a corrected response.

Very truly yours,

DASager
D. A. Sager
Vice President
St. Lucie Plant

DAS/GRM/kw

Attachment

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

DAS/PSL #311

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PDR ADOCK 05000335
Q PDR

TEC
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RESPONSE TO NOTICE OF VIOLATION

FINDING:

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 effect 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.

10 CFR 50, Appendix B, Criterion VIII, Identification and Control of Materials, Parts and Components, as implemented by approved FPL Topical Quality Assurance Report 1-76A, Rev 15, TQR 8.0, Identification and Control of Materials, Parts, and Components, requires that measures be designed to prevent the use of incorrect materials, parts or components. This is further implemented on site by procedure QI-PR/PSL-8.1, Rev 11, Identification Control of Materials, Parts, and Components.

Contrary to the above, in the two safety-related repair examples cited below, the licensee failed to control material and ensure quality at least equivalent to that specified in original design bases and requirements, materials specifications, and inspection requirements in that:

1. The equipment manual for the Reactor Protection System channel "C" cabinet failed to specify approved replacement wire material. As a result, on August 21, 1990, non-authorized wire material was installed in the Unit 2 cabinet during the replacement of the reactor coolant pump mode selector switch. The licensee did not establish qualification by other means.
2. On August 24, 1990, a non-authorized sealant was used on a 1A Component Cooling Water (CCW) pump shaft mechanical seal leak. The unapproved sealant was applied to the joint after an "O" ring at the seal retaining collar was compressed, causing a minor leak at the collar-to-pump casing joint. "O" ring replacement would have required partial pump disassembly.

In each instance, subsequent engineering evaluation was requested after repair completion and NRC inquiry. These evaluations concluded that the repairs were acceptable, but this was not known at the time of the repair. The CCW system was in operation during the evaluation but the RPS channel remained out of service until authorized material was obtained and installed.

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RESPONSE:

1. Florida Power and Light Company (FPL) concurs with the violation.
2. The reason for the violation was personnel error coupled with inadequate procedure.
3. The following actions were taken to correct the specific items of noncompliance:
 - a. The improper wire was replaced with vendor recommended wire.
 - b. The sealant used on the Component Cooling Water Pump was evaluated by FPL Engineering and determined to be acceptable for use.
4. The following corrective actions have been or will be implemented:
 - a. Interim Measures:

Until the procedure changes can be made and training conducted the following interim measures will be implemented:

 - (1) The Maintenance Superintendent has issued a letter describing the requirements for material control. All parts or material used in safety-related component repairs will be verified to conform to requirements (i.e. Technical Manuals, drawings, procedures, procurement specifications, or stores material identification sheets). If material can not be verified work will be stopped until a written Engineering disposition is received.
 - (2) These instructions will be reviewed with all Maintenance Personnel to ensure compliance.
 - b. Program Corrections:
 - (1) The work control procedure will be revised to provide the detail to properly implement the plant quality instructions.
 - (2) Our programs to control chemicals and consumable materials will be reviewed and revised as necessary.
 - (3) Training will be held for all Maintenance Personnel on the revised material control procedures.

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5. Corrective action status.

- a. Corrective actions 3.a. and 3.b. were completed before the end of the inspection period.
- b. Corrective action 4.a. will be complete by November 30, 1990.
- c. Corrective action 4.b.(1) will be completed by December 31, 1990.
- d. Corrective Action 4.b.(2) will be complete by January 31, 1991.
- e. Corrective Action 4.b.(3) will be complete by February 28, 1991.

