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 FACIL: 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH. NAME AUTHOR AFFILIATION
 GOLDBERG, J.H. Florida Power & Light Co.
 RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC ltr re violations noted in Insp Rept
 50-389/91-11. Corrective actions: mgt expectations re existing
 valve verification policy restated to operations staff. Civil
 payment to be transmitted by electronic transfer.

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L-91-193
10 CFR 2.201

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

Dear Sir:

Re: St. Lucie Unit 2
Docket No. 50-389
Inspection Report 91-11
Reply to Notice of Violation EA 91-062

Florida Power and Light Company (FPL) has reviewed the subject notice of violation. Pursuant to the provisions of 10 CFR 2.201 and Section 182 of the Atomic Energy Act of 1954, as amended, the reply to the notice of violation is attached. FPL will pay the civil penalty by electronic transfer. This payment will be confirmed under separate cover.

Very truly yours,

J. H. Goldberg
President - Nuclear Division

JHG:JWH:kw

Attachment

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

DAS/PSL #465-91

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PDR ADOCK 05000389
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an FPL Group company

St. Lucie Unit 2
Docket No. 50-389
Inspection Report 91-11
Reply to Notice of Violation

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) ss.

J. H. Goldberg being first duly sworn, deposes and says:

That he is President, Nuclear Division of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.



J. H. Goldberg

Subscribed and sworn to before me this
11 day of July, 19 91.



NOTARY PUBLIC, in and for the County of
Palm Beach, State of Florida

My Commission expires Notary Public, State of Florida
 My Commission Expires June 1, 1993
 Bonded Thru Troy Fain - Insurance Inc.



St. Lucie Unit 2
Docket No. 50-389
Inspection Report 91-11
Reply to Notice of Violation

VIOLATION:

Unit 2 Technical Specification 3.6.2.1, Containment Spray System, requires that, in Modes 1, 2, and 3, two independent containment spray systems be OPERABLE. Further, this Technical Specification requires that each spray system flow path from the containment sump shall be via an OPERABLE shutdown cooling heat exchanger. If one containment spray system is inoperable, it must be restored within 72 hours or the unit must be in hot standby within six hours.

Unit 2 Technical Specification definition 1.19 defines a system, subsystem, train, component, or device as being OPERABLE or having OPERABILITY when it is capable of performing its specified function(s) and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication, or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

Contrary to the above, with Unit 2 operating Mode 1, the 2A containment spray system was not OPERABLE from about November 29, 1990, when manual component cooling water valve 2-SB-14365, servicing the 2A shutdown cooling heat exchanger, was locked closed vice locked open, until April 26, 1991. The 2A shutdown cooling heat exchanger was not OPERABLE with the manual component cooling water outlet valve closed as it would not cool recirculation flow from the containment sump with no cooling water flow. The 2A containment spray system was not OPERABLE with an inoperable shutdown cooling heat exchanger.

RESPONSE:

1. Florida Power and Light Company concurs with the violation.
2. The reasons for the violation were:
 - a) Cognitive personnel error by a non-licensed operator which led to the closure of valve 2-SB-14365.
 - b) Operators relied on visual verification methods to check locked valves instead of using the established valve verification policy.
 - c) Management follow-up of the existing valve verification policy implementation was insufficient.

St. Lucie Unit 2
Docket Nos. 50-389
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- d) Valve 2-SB-14365 position indicator had a faulty position indicator design which caused the position indicator to be inoperable.
3. Valve 2-SB-14365 was immediately opened and the CCW outlet valve on the other train was verified and found open. In addition, a hands-on verification of 409 safety related valves for Units 1 and 2 was conducted. No discrepancies were discovered.
 4. The corrective actions taken to prevent recurrence were:
 - a) Management expectations regarding the existing valve verification policy were restated to the Operations staff by the President - Nuclear Division.
 - b) A discipline policy concerning procedural non-compliance has been issued by the President, Nuclear Division.
 - c) Joint Quality Control/Operations surveillances of the Weekly Valve Status Check (Administrative Procedure AP 0010125A, Data Sheet 36) are being performed. These surveillances have uncovered no discrepancies as of this date.
 - d) A valve indicator enhancement to all applicable Pratt valves on Units 1 and 2 has been completed.
 5. All corrective actions have been completed.