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 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.      05000389  
 AUTH. NAME      AUTHOR AFFILIATION  
 GOLDBERG, J.H.      Florida Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Responds to violations noted in Insp Repts 50-250/91-19 & 50-251/91-19. Corrective actions: Const Svcs Procedure ASP-30, "Application of Protective Coatings" will be revised to include plant maint coating spec.

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L-91-334  
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  
Response to Notice of Violation  
Inspection Report 91-19

Florida Power and Light Company has reviewed the subject inspection report and pursuant to 10 CFR 2.201 the response is attached.

Very truly yours,

J. H. Goldberg  
President - Nuclear Division

JHG/JWH/kw

Attachment

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

DAS/PSL 582-91

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ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION

FINDING:

Unit 1 Technical Specification (TS) 6.8.1.a required 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, included maintenance that can affect the performance of safety-related equipment.

Procedure QI 5-PR/PSL-1, Rev 46, Preparation, Revision, Review/Approval of Procedures, section 5.8, implemented TS 6.8.1 and required that procedures be strictly adhered to.

Procedure CN-2.27, Rev 1, Furnishing and Application of Service Level II and Balance-of-Plant Maintenance Coatings, required that while painting or coating, adjacent equipment such as emergency diesels and support equipment shall be protected. The procedure further detailed the types of equipment and possible means of protection.

Contrary to the above, on September 24, 1991, the 2A EDG room and equipment contained therein was found unprotected during a floor painting preparation activity. The still-in-service EDG and support equipment was dusted with paint and concrete material removed by mechanical abrasion tools, with additional material and debris still on the floor. The situation could have been aggravated had the EDG and the attached radiator cooling fans automatically started. The resulting wind would have blown dust and debris into critical locations on or in the equipment.

RESPONSE:

1. The reason for the violation was personnel error coupled with an inadequate procedure.
2. The work was immediately stopped and the area cleaned up. The painting supervisor, painting foreman, and painters were given additional instruction on the requirements of CN-2.27 (Service Level II and Balance of Plant Maintenance Coatings Specification). A pre-work checklist which implements the equipment protective requirements of CN-2.27 has been developed. The checklist includes: 1) Noting the pre-work condition of the area, 2) List of the equipment, valves, etc. that have to be protected, 3) Sign-offs by the FPL and contractor supervisors. A temporary change to Construction Services procedure ASP-30 "Application of Protective Coatings" has been developed to include the pre-work checklist. This temporary change has been implemented.
3. Construction Services procedure ASP-30 "Application of Protective Coatings" will be revised to include the requirements of CN-2.27 and the pre-work checklist. The plant procedure for cleanliness control will be reviewed and enhanced as necessary.
4. Construction services procedure ASP-30 will be revised by January 15, 1992. The plant cleanliness control procedure will be reviewed and enhanced as necessary by January 31, 1992. Full compliance will be achieved on January 31, 1992.

