

NOTICE OF VIOLATION

Florida Power & Light Company
St: Lucie 1 and 2

Docket Nos. 50-335 and 50-389
License Nos. DPR-67 and NPF-16

During an NRC inspection conducted on November 5 - December 23, 1991, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

- A. Unit 1 Technical Specification (TS) 3.9.4.c requires that, during core alterations or movement of irradiated fuel within the containment, containment penetrations providing direct access from the containment atmosphere to the outside atmosphere shall be closed. The TS specifically addresses manual isolation valves on penetrations communicating with the containment.

Unit 1 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.e, addresses general procedures for the control of maintenance, repair, replacement, etc. and that these procedures include the method for obtaining permission and clearance for operation personnel to work and for logging such work. These requirements are implemented on site, in part, by Administrative Procedure (AP) 0010432, Revision 56, Nuclear Plant Work Orders, paragraphs 8.4.4 and 8.4.5, which require that Senior Reactor Operator (SRO) permission be obtained prior to starting work on installed plant equipment.

Contrary to the above, on November 10, 1991, at approximately 4:00 p.m., while fuel movement was in progress, licensee personnel failed to implement (follow) AP 0010432 by, without SRO permission, removing relief valve SR 14-8B in containment by grinding it off a component cooling water (CCW) pipe and covering the one-inch hole with a non-airtight cover. The CCW pipe, which penetrated containment, had been drained in preparation for the valve removal, however the pipe surface was being used to establish containment boundary integrity and workers did not have SRO permission to proceed. Removing valve SR 14-8B created a direct access between the containment atmosphere and the Reactor Auxiliary Building atmosphere via open one-inch manual drain valve V14319. On November 11, at approximately 1:30 p.m., when workers requested permission to proceed with the valve repair, the SRO discovered what had happened and immediately closed V14319, restoring containment boundary integrity. Seven fuel bundles had been moved without containment integrity.

This is a Severity Level IV violation (Supplement I) and applies to Unit 1 only.



- B. Units 1 and 2 TS 4.8.1.1.2.d require that, at least once every 31 days, emergency diesel generator (EDG) fuel oil storage tank total particulate concentration be verified to be below 10 milligrams/liter (mg/l) when checked in accordance with ASTM standard D2276-83, Method A, or Annex A-2. The ASTM test methodology was implemented by site test procedure C-121, Revision 0, Determination of Particulate Contamination . . . Diesel #2 Fuel Oil.

Contrary to the above, although the emergency diesel generator fuel oil storage tanks had been sampled appropriately and tested at the proper times, the test methodology was not transcribed correctly from the ASTM standard to the test procedure in that an incorrect reagent was specified. When used, the incorrect reagent (isopropyl alcohol instead of either petroleum ether or trichlorotrifluoroethane) washed away a portion of the total particulate content such that the site's analysis result was consistently less than the actual value.

Incorrect licensee analysis contributed to three of the four onsite EDGs being inoperable. Analysis of October 23, 1991, samples by an offsite test laboratory that were reported on November 4, 1991, showed particulate concentrations exceeding TS limits in three of four fuel oil storage tanks (12.9, 16.4, and 16.6 mg/l for tanks 1A, 1B, and 2B respectively). Comparable licensee analysis results of November 4, 1991, samples showed 2.3 and 6.1 milligrams per liter in the 1B and 2B fuel oil storage tanks, respectively.

This is a Severity Level IV violation (Supplement I) and applies to both Unit 1 and Unit 2.

- C. Unit 1 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 10, addresses procedures for maintaining water quality within prescribed limits.

Unit 1 TS 3.4.7 requires Reactor Coolant System (RCS) chloride steady state concentration be maintained less than or equal to 0.15 part per million (ppm) and requires certain actions if this limit is exceeded for 24 hours.

These requirements, as well as various commitments under the approved quality assurance program, were implemented on site by procedure QI 13-PR/PSL-2, Revision 14, Cleanliness Control Methods. Sections 5.1, 5.3, and 5.7 of this procedure allowed cleaning RCS components only with approved solvents or water with less than 0.15 ppm chloride concentration.

Contrary to the above, on November 25, 1991, licensee personnel failed to implement procedure QI 13-PR/PSL-2 during high pressure water jet cleaning of the reactor vessel head seating area, which was submerged in water in the reactor cavity. No procedure controlled the high pressure water jet cleaning activity. The water supply hose was connected to an improper

source and approximately 1000 gallons of chlorinated potable water from the city water main was introduced into the RCS. This contamination resulted in RCS chloride levels of 226 ppb (0.226 ppm) which exceeded the TS steady state limit. This condition was mitigated by the chloride contamination being reduced to acceptable limits within forty hours. The TS 3.4.7 required evaluation was performed and indicated that no damage had occurred to the fuel or RCS subcomponents.

This is a Severity Level IV violation (Supplement I) and applies to Unit 1 only.

Pursuant to the provisions of 10 CFR 2.201, the Florida Power & Light Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region II, and if applicable, a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION



Marvin V. Sinkule, Chief
Reactor Projects Branch 2
Division of Reactor Projects

Dated at Atlanta, Georgia
this 22nd day of January 1992

