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ACCESSION NBR: 9202180192 DOC. DATE: 92/02/11 NOTARIZED: NO DOCKET #: 05000335
 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.
 AUTH. NAME: GOLDBERG, J.H. AUTHOR AFFILIATION: Florida Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 920211 ltr re violations noted in insp rept 50-335/91-24 on 920210. Corrective actions: Radiographic Rept Form was revised to clarify info required & film for five welds were remarked.

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FEB 11 1992

L-92-32
10 CFR 2.201

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

Gentlemen:

Re: St. Lucie Unit No. 1
Docket No. 50-335
Reply to Notice of Violation
Inspection Report 91-24

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 616-92

9202180192 920211
PDR ADDCK 05000335
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ATTACHMENT

REPLY TO NOTICE OF VIOLATION

FINDING:

10 CFR 50, Appendix B, Criterion V as implemented by Florida Power and Light Company's Topical Quality Report 1-76A requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings. Florida Power and Light (FP&L) Company's Radiographic Inspection Procedure #TS 9.3, Revision 0, paragraph 14.F requires that; permanent, non-permanent, and info films shall have the following identification permanently included on each film by use of lead characters during exposure or by visible light imprinter. The film identified shall not obscure the area being evaluated and shall be legible:

- *FPL-PSL-No. _____ Unit number
- *PC/M or CWO No.
- *System or Component Identification and Drawing No., Rev. No.
- *Weld No. or part number (as applicable)
- *Weld Repair Report No. (If applicable)
- *Date

Contrary to the above, On December 5, 1991 radiographic film for weld CH-554-001M, CH544-001N, 2F1-HVS-001D, and 2F1-HVS-101 were found either failing to have permanent film identification on the film, having film identification that was not legible, or having only partial film identification acquired by procedure T.S.9.3. In addition, the Radiographic Inspection Report for weld 2F-1-CH-0553-030 had not been signed or dated by the radiographer, weld 2F-1-CH-0544001N had been dated by the radiographer with a date 6 months after the film had been reviewed and repaired, and weld 2F-1-HVS-0010 had missing entries for the Report No. of exposures, and number of film which was in violation of procedure T.S.9.3. paragraph 17.B.1

RESPONSE:

1. The reason for the violation was personnel error.
2. A review of every radiograph and associated report for the period January 1, 1990 through December 31, 1991 was performed. The results of this review were as follows: 1) no films were missing; 2) film for five welds were remarked because the film identification was either partially visible or not visible at all; 3) one report had the radiographer's signature missing; 4) several reports had a few unmarked blocks (e.g., shim material or lead screen). This review and any necessary corrections were completed on January 14, 1992.



3. Technique Sheet 9.3 "Radiographic Inspection" was reviewed and corrected by a Limited Change Notice to eliminate unnecessary film and film envelope marking requirements. The Radiographic Report Form was revised to clarify and streamline the information required and include a checkoff by the radiographer to ensure all required film identification is legible on the film. Inspectors and document review personnel have been retrained in these requirements. The final training class was held on February 10, 1992.
4. Full compliance was achieved on February 10, 1992.

All permanent radiographs conducted during the Spring 1992 Unit 2 outage, will be reviewed by the Nuclear Assurance NDE Level 3 inspector to ensure that all problems with film identification and inspection have been completely resolved.