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 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 920219 ltr re violations noted in insp rept
 50-335/91-22 & 50-389/91-22. Corrective actions: containment
 integrity was established & foreman crew were counseled on
 need for strict adherence to procedures.

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FEB 19 1992

L-92-36
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
Reply to Notice of Violation
Inspection Report 91-22

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 #619-92

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PDR ADOCK 05000335
Q PDR

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ATTACHMENT

REPLY TO NOTICE OF VIOLATION

FINDING (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.

RESPONSE (A):

1. The reason for the violation was procedural non-compliance personnel error.



2. a) Containment integrity was established by Operations on November 11, 1991 at 0210 by closing drain valve V-14139.
b) The foreman and crew were counseled on the need for strict adherence to procedures.
c) This event was also discussed with all maintenance crews stressing the importance of receiving proper authorization prior to beginning work on plant systems.
3. a) This event will be included as part of In-House Events training to be held in February of 1992.
b) A change to the clearance procedure will be made to include a check by the NPS/ANPS/NWE when authorizing clearances to evaluate their effects on containment boundaries. This change is scheduled for completion by April 20, 1992.
4. Full compliance was achieved on November 11, 1991.

FINDING (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.

RESPONSE (B):

1. The reason for the violation was personnel error in transposing a pertinent step from the ASTM to the plant procedure.
2. The affected procedure, "C-121 Determination of Particulate Contamination; and Check for Clear and Bright Appearance with Proper Color Diesel #2 Fuel Oil," was revised on November 5, 1991 to include the correct reagent, making the analytical method correct.
3. The revised procedure C-121 and all other diesel analytical procedures were evaluated by an outside contractor knowledgeable in fuel oil testing and ASTM methods. The result of this evaluation showed that the other analytical methods are technically correct.
4. Full compliance was achieved on November 5, 1991.

FINDING (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.

RESPONSE (C):

1. The reason for the violation was inadequate procedural guidance.
2. a) Operations personnel performed a feed and bleed of the RCS until acceptable chloride levels of less than or equal to .15 ppm were attained.
b) Engineering performed an evaluation of the consequences of the chlorides in contact with the fuel assemblies and the RCS piping which concluded that operation could continue in any operational mode.
3. a) A specific hydrolazing procedure is being developed to control the use of supply water for these types of evolutions. This procedure will be completed by April 20, 1992.
b) The Unit 1 and 2 Reactor Vessel Maintenance procedures are being revised to reference the hydrolazing procedure. This procedure will be revised by April 20, 1992.
4. Full compliance will be achieved on April 20, 1992.