

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9203230243      DOC. DATE: 92/03/19      NOTARIZED: NO      DOCKET #  
 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.      05000335  
 AUTH. NAME      AUTHOR AFFILIATION  
 GOLDBERG, J.H.      Florida Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
                                  Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Rept 50-335/91-27.  
 Corrective actions: personnel advised that policy of taking credit for compensatory operation actions does not replace need to declare equipment out of svc.

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L-92-68  
10 CFR 2.201

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

Re: St. Lucie Unit No. 1  
Docket No. 50-335  
Reply to Notice of Violation  
Inspection Report 91-27

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 #645-92

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ATTACHMENT

REPLY TO NOTICE OF VIOLATION

FINDING:

Unit 1 Technical Specification (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 1 includes procedures for equipment control and for log entries. This was implemented on site in part by OP 0010129, Rev 18, Equipment Out-Of-Service, which required that all equipment required by TS shall be logged in the Equipment Out-of-Service Log when that equipment has been determined to be inoperable.

TS 3.8.1.1.a. requires that, while in Modes 1 - 4, two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system be operable.

Contrary to the above, on December 23, 1991, while in Mode 1, licensee operators made the A-train physically independent circuit between the offsite transmission network and the onsite Class 1E distribution system inoperable by racking out the 1A startup transformer circuit breaker and removing it, without declaring the A-train offsite circuit inoperable or logging the condition in the Equipment Out of Service Log.

RESPONSE:

1. The reason for the violation was cognitive personnel error by a licensed operator.
2. On March 6, 1992, 30 minutes after racking out the 1A Startup Transformer breaker for troubleshooting, the breaker was racked in by Operations. This action returned the A train offsite circuit to operable status. The offsite circuit was inoperable for approximately 30 minutes without being logged as such. During the entire period licensed and non-licensed operations, electrical maintenance, and system protection personnel were at the 1A Startup Transformer breaker and available to return it to service if required.
3. It has been transmitted to operations personnel that the policy of taking credit for compensatory operator actions during short term troubleshooting does not replace the need to formally declare the equipment out of service (OOS) and enter it in the OOS Log.
4. Full compliance was achieved on March 6, 1992