

NOTICE OF VIOLATION

Florida Power & Light Company
St. Lucie 2

Docket No. 50-389
License No. NPF-16

During an NRC inspection conducted on March 24 - May 2, 1992, 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 (1992), the violations are listed below:

- A. Unit 2 Technical Specification (TS) 6.8.1.c required that written procedures shall be established, implemented, and maintained covering surveillance and test activities of safety-related equipment. TS 4.7.1.1 and associated table 4.7-0, Steam Line Safety Valves, required that four specific safety valves per SG be verified to be set at 1000 psia +/- one percent [10 psi], and that the other four be set at 1040 psia +/- one percent. Licensee procedure GMP-0705, Rev 17, Main Steam Safety Valve Maintenance and Setpressure Testing, implemented these requirements. GMP-0705 section 8.0, Material and Equipment Required, plainly specified that all test gages shall have an accuracy of 0.5% of full scale.

Contrary to the above, on April 21, 1992, the licensee failed to implement GMP-0705 section 8.0, Material and Equipment Required, by using 200 pound per square inch gage M-201 which had a large one percent calibration label on its side and was also accompanied by a calibration record showing that it actually varied over a one percent range. Another gage in use that had not been questioned also had a large one percent calibration label but the calibration record showed that it was actually satisfactory for this test.

This is a Severity Level IV violation (Supplement I).

- B. Unit 2 Technical Specification (TS) 3.3.2 and included Table 3.3-3 required that Engineered Safety Features Actuation System (ESFAS) instrumentation be OPERABLE for the Containment Spray function in operational Modes 1, 2, or 3; including a minimum of three of the four channels of Containment Pressure - High-High. Action Statement 17 required that, with three of the four channels OPERABLE, the inoperable channel must be placed in the tripped condition within 48 hours. Action Statement 17 further stated that one additional channel may be bypassed for up to two hours for surveillance testing.

Unit 2 TS 3.3.2 and included Table 3.3-3 also required that ESFAS instrumentation be OPERABLE for the Safety Injection, Containment Isolation, and Main Steam Line Isolation functions in operational Modes 1, 2, or 3; including a minimum of three of the four channels of Containment Pressure - High. Action Statement 13 required that, with three of the four channels OPERABLE, power operation may continue provided that the inoperable channel is placed in the bypassed or tripped condition within one hour. Action Statement 14 required that, with two of the four



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channels inoperable, power operation may continue provided that one of the inoperable channels has been bypassed and the other inoperable channel is placed in the tripped condition within one hour.

Unit 2 TS 3.3.1 and included Table 3.3-1 required that reactor protective system (RPS) instrumentation be OPERABLE in operational Modes 1 or 2, including a minimum of three of the four channels of Containment Pressure - High. Action Statement 2.a required that, with three of the four channels OPERABLE, power operation may continue provided that the inoperable channel is placed on the tripped or bypassed condition within one hour. Action Statement 2.b required that, with two of the four channels OPERABLE, power operation may continue provided that one of the inoperable channels has been bypassed and the other inoperable channel is placed in the tripped condition within one hour.

Contrary to the above, Containment Pressure Channel C (High and High-High) was inoperable at least during the previous operating cycle from about December, 1990 to April 22, 1992, because its instrument sensing line inside containment was capped, and Containment Pressure Channel C was not placed in the tripped or bypassed condition as required. During most of this time, St. Lucie Unit 2 was operated in Mode 1 or 2. Additionally, with Containment Pressure Channel C inoperable, another channel of containment pressure was placed in bypass on April 19, 1992, for a total of approximately 3 hours, while the unit was operated in Mode 1 or 2.

This is a Severity Level IV violation (Supplement I).

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 a copy to the NRC Resident Inspector at the facility that is the subject of this notice, 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 or demand for information may be issued as to 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.

Dated at Atlanta, Georgia
this 29th day of May 1992.