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 FACIL: 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 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 50-389/92-07.
 Corrective actions: on 920421, main steam safety valve testing stopped & gauge calibr data sheets reviewed & containment pressure sensing lines will be labeled.

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JUN 26 1992

L-92-172
10 CFR 2.201

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

Re: St. Lucie Unit 2
Docket No. 50-389
Reply to Notice of Violation
Inspection Report 92-07

Florida Power and Light Company (FPL) has reviewed the subject inspection report and pursuant to 10 CFR 2.201 the response to the notice of violation is attached.

Very truly yours,

A handwritten signature in cursive script that reads "J. H. Goldberg".

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 #713-92

020105

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PDR ADDCK 05000389
G PDR

an FPL Group company

Handwritten initials "IEO" and the number "11" written below them.

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VIOLATION (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 [10psi], 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.

VIOLATION (B):

Unit 2 Technical Specification (TS) 3.3.2 and included Table 3.3-3 required that Engineering 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 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.

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VIOLATION (B):
(continued)

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.

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RESPONSE (A):

1. The reason for the violation was personnel error on the part of Maintenance Supervision. Supervision did not verify the procedural requirements for Test Gauge Calibration accuracy were met. A factor contributing to this personnel error was that the requirements for gauge accuracy were not specified in all applicable sections of the maintenance procedure.
2. Corrective Steps Taken and Results Achieved

On April 21, 1992, Main Steam Safety Valve testing was stopped and gauge calibration data sheets were reviewed. Gauge #201 was determined not to meet the .5% accuracy requirement and was replaced with a new gauge meeting the .5% accuracy standard. The Main Steam Safeties which had been tested with Gauge #201 were retested using the new gauge and determined not to require adjustment. All personnel involved were made aware of the infraction and the need for procedural compliance.
3. Corrective Steps to Avoid Further Violations
 - a) A memo was issued to all Production Supervisors and Foremen to stress the importance of procedural compliance.
 - b) Disciplinary action was administered to the Maintenance Supervision involved in this event.
 - c) Maintenance procedure GMP-0705 will be revised to specify the gage accuracy requirements in all applicable sections of the procedure and include gauge accuracy requirements as part of the QC holdpoint to verify M&TE of pressure gauges.
 - d) Mechanical Maintenance will review all safety and relief valve test procedures to ensure test gauge ranges, type, and accuracy requirements are adequately specified.
4. Full compliance was achieved on April 21, 1992, upon completion of corrective action in paragraph 2.

Maintenance procedure reviews/revisions will be completed by August 21, 1992.

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RESPONSE (B):

1. The reason for the violation was personnel error which resulted in the inadvertent capping of the high pressure sensing line to the containment pressure transmitter PT-07-2C.

2. Corrective Steps Taken and Results Achieved
 - a) The cap attached to the sensing line was removed on May 7, 1992 restoring the operability of the instrument channel.
 - b) An examination of maintenance and operating history was performed to determine the period of inoperability and the work authorized on this instrument. Documented evidence indicates that no related work was authorized on this instrument. The evidence also indicates that the instrument was last verified to be operable on April 13, 1989, when the sensing lines were proven to be unobstructed.
 - c) An engineering analysis and a PRA were performed to identify the potential consequences of this instrument channel being inoperable. The conclusion of this analysis established that neither a containment breach nor additional core damage would result from this sensing line being capped.
 - d) A pressurized air test was performed on all other Unit 1 and Unit 2 containment pressure transmitter sensing lines which verified all sensing lines were unobstructed. This was performed on May 7, 1992.

3. Corrective Steps to Avoid Further Violations
 - a) Containment pressure sensing lines on Unit 1 and 2 will be labeled to prevent inadvertent capping utilizing the established plant labeling procedures. Unit 2 will be completed prior to Mode 4 during the 1992 refueling outage. Unit 1 will be completed during the 1993 Spring refueling outage.
 - b) Plant drawings on Unit 2 will be revised as necessary to identify required sensing line cap configuration by October 14, 1992. Unit 1 drawings will be revised by August 1, 1993.

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- c) A new containment atmosphere penetration inspection procedure (I&C Procedure No. 1400205) has been written to verify selected containment instrumentation piping penetrations which sense the containment open volume atmosphere are free of obstructions. This instrumentation includes process inputs into the Containment Hydrogen Analyzer, Containment Atmosphere Radiation Monitoring, Engineered Safety Features Actuation System, Reactor Protection System, and Containment Differential Pressure Instrumentation. This procedure will be performed prior to a reactor startup following each refueling outage.
- d) Mud-dauber caps (insect end-covers) have been installed on Unit 2 containment pressure sensing lines to preclude personnel from capping them. Unit 1 installation will occur during the 1993 Spring refueling outage.

4. Full compliance was achieved on May 7, 1992, upon completion of corrective action in paragraph 2.a).

Corrective Action 3a for Unit 2 will be completed prior to heatup to mode 4 during the 1992 refueling outage.

Corrective Action 3a for Unit 1 will be completed during the 1993 Spring refueling outage.

Corrective Action 3b for Unit 2 will be completed by October 14, 1992.

Corrective Action 3b for Unit 1 will be completed by August 1, 1993.

Corrective Action 3d for Unit 1 will be completed during the 1993 Spring refueling outage.