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 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 NRC ltr re violations noted in insp rept 50-335
 92-09. Corrective actions: new contractor orientation
 procedure will be developed & surveillances of contractor
 exams will be increased during next refueling outage.

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JUL 16 1992

L-92-192
10 CFR 2.201

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

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Reply to Notice of Violation
Inspection Report 92-09

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 #726-92

9207210324 920716
PDR ADDCK 05000335
Q PDR

Handwritten initials 'IEO1' with a vertical line through the '1'.

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
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VIOLATION:

Title Ten Code of Federal Regulations as implemented by Florida Power and Light (FP&L) Company's Topical Quality Report 1-76A requires activities affecting quality be accomplished in accordance with procedures and drawings. FP&L procedure NDE-3.3, Revision 3, Liquid Penetrant Examination Solvent Removable Visible Dye Technique, Paragraph 5.1 A. states "The examination area for circumferential and longitudinal welds shall be the weld and base material for a distance of 1 inch on each side of the weld fusion line.". FP&L procedure NDE-3.3, Revision 3, Liquid Penetrant Examination Solvent Removable Visible Dye Technique, Paragraph 3.4 A.2. states "Prior to examination, the surface to be examined and any adjacent area within at least 1 inch shall be dry and free of any dirt, grease, lint, scale, welding flux, paint, weld spatter, oil, or other extraneous matter that would interfere with the examination."

Contrary to the above activities affecting quality were not accomplished in accordance with procedures as indicated below:

On May 19, 1992, during an Inservice Inspection of ASME Code Class 2 Safety injection system circumferential butt weld SI-424-2-SW-3, an NDE examiner applied penetrant dye to an area only 3/4 inch wide on each side of the weld, for several inches, thus limiting the examination to 3/4 inch of adjacent base material in some areas.

On May 7, 1991, at that point in the Inservice Inspection Liquid Penetrant examination of ASME Code Class 1 Reactor Coolant system circumferential socket weld No. RC-142-FW 7 after the completion of the precleaning/surface preparation and prior to the application of penetrant dye, a buildup of white foreign matter remained at the toe of the weld on the pipe, which would interfere with the examination, thus invalidating the exam.



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RESPONSE:

1. The reason for the violation was personnel error on the part of contract examiners. The individuals involved failed to perform their examinations with the appropriate attention to detail called for by the procedure.

2. Corrective Steps Taken and Results Achieved
 - A) The examiners involved were interviewed by FPL/Equipment Support & Inspection (ESI) personnel. The need for attention to detail and procedure compliance were stressed.
 - B) The examiners involved were released from the site.
 - C) The importance of procedure compliance and attention to detail was re-emphasized to the remaining contract examination personnel.
 - D) In accordance with Code Programs procedure JI-CPS-15.0, Revision 0, Nonconformance Reports, the conditions noted by the NRC Inspector were documented on NCR 92-001.
 - E) The ESI supervisor responsible for the technical supervision of examination activities was counseled on the importance of proper contractor orientation and the need for an aggressive contractor surveillance program.

3. Corrective Steps to Avoid Further Violations
 - A) A new contractor orientation procedure, JI-NDE 2.1, "Orientation for Contractor Personnel," will be developed. This procedure will place additional emphasis on attention to detail and procedure compliance. The procedure will be completed by August 31, 1992.
 - B) Surveillances of contractor examinations will be increased during the next refueling outage to ensure the new orientation procedure is working.

4. Full compliance was achieved on May 26, 1992, upon completion of corrective actions in paragraph 2.

Procedure JI-NDE 2.1, "Orientation for Contractor Personnel" will be completed by August 31, 1992.