

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SESSION NBR: 9209180164      DOC. DATE: 92/09/09      NOTARIZED: NO      DOCKET #  
 FILE: 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.      05000389  
 AUTH. NAME      AUTHOR AFFILIATION  
 GOLDBERG, J.H.      Florida Power & Light Co.  
 RECIPIENT NAME      RECIPIENT AFFILIATION  
                                  Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to violations noted in Insp Rept  
 50-389/92-11. Corrective actions: work completed to  
 reinstall seismic clamp under Plant Work Order 92041291 on  
 920710 & change to nuclear plan work orders completed.

DISTRIBUTION CODE: IE01D      COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3  
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

|           | RECIPIENT        |  | COPIES |      |  | RECIPIENT       |    | COPIES |      |
|-----------|------------------|--|--------|------|--|-----------------|----|--------|------|
|           | ID CODE/NAME     |  | LTR    | ENCL |  | ID CODE/NAME    |    | LTR    | ENCL |
|           | PD2-2 PD         |  | 1      | 1    |  | NORRIS, J       |    | 1      | 1    |
| INTERNAL: | ACRS             |  | 2      | 2    |  | AEOD            |    | 1      | 1    |
|           | AEOD/DEIB        |  | 2      | 2    |  | AEOD/DSP/TPAB   |    | 1      | 1    |
|           | AEOD/TTC         |  | 1      | 1    |  | DEDRO           |    | 1      | 1    |
|           | NRR MORISSEAU, D |  | 1      | 1    |  | NRR/DLPQ/LHFBPT |    | 1      | 1    |
|           | NRR/DLPQ/LPEB10  |  | 1      | 1    |  | NRR/DOEA/OEAB   |    | 1      | 1    |
|           | NRR/DREP/PEPB9H  |  | 1      | 1    |  | NRR/PMAS/ILRB12 |    | 1      | 1    |
|           | NUDOCS-ABSTRACT  |  | 1      | 1    |  | OE DIR          |    | 1      | 1    |
|           | OGC/HDS3         |  | 1      | 1    |  | <u>REG FILE</u> | 02 | 1      | 1    |
|           | RGN2 FILE 01     |  | 1      | 1    |  |                 |    |        |      |
| EXTERNAL: | EG&G/BRYCE, J.H. |  | 1      | 1    |  | NRC PDR.        |    | 1      | 1    |
|           | NSIC             |  | 1      | 1    |  |                 |    |        |      |

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK.  
 ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION  
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 24 ENCL 24



SEP - 9 1992

L-92-244  
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 92-11

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, appearing to read "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 #768-92

20116  
9209180164 920909  
PDR ADOCK 05000389  
Q PDR

Handwritten initials or a signature, possibly "JHG", written in the bottom right corner of the page.

Re: St. Lucie Unit 2  
Docket No. 50-389  
Reply to Notice of Violation  
Inspection Report 92-11

**VIOLATION:**

Unit 2 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 9.a, includes maintenance that can affect the performance of safety-related equipment. This requirement is implemented in part by procedure AP 0010432, Rev 60, Nuclear Plant Work Orders, paragraph 8.10, which requires that all work be completed within the scope of the work document.

Contrary to the above, during a Unit 2 tour on July 10, 1992, the NRC inspector observed that a large seismic support under safety-related MV-21-4B, the Train "B" Motor Operated Valve for the seal water supply header, was not attached to the safety-related conduit serving MV-21-4B, thus was not performing its safety function. The conduit had not been reattached to this seismic support following the temporary removal of both to facilitate completion of plant change 273-290D, Monel Substitution for Aluminum Bronze, during the recent refueling outage. The licensee should have known from the work control and inspection processes that the conduit was not attached as designed.

The licensee subsequently reviewed the as-found condition for operability since the licensee had recently changed the Unit 2 operating mode several times with this seismic support disassembled. Subsequent licensee stress analysis found that both the electrical conduit and MV-21-4B had actually been operable as found in spite of the conduit not being attached to the support.

Re: St. Lucie Unit 2  
Docket No. 50-389  
Reply to Notice of Violation  
Inspection Report 92-11

RESPONSE:

1. The reason for the violation was lack of procedural guidance in AP 0010432 "Nuclear Plant Work Orders." This procedure lacked guidance to planners concerning work order planning on seismic structures in the maintenance area. A contributing factor was personnel error on the part of maintenance workers and supervision. The maintenance workers and supervision were not sensitive to the importance of certain components necessary for meeting seismic requirements.
2. Corrective Steps Taken and Results Achieved
  - A) Work was completed to reinstall the seismic clamp under plant work order 92041291 on July 10, 1992.
3. Corrective Steps to Avoid Further Violations
  - A) A change to AP 0010432 "Nuclear Plant Work Orders" has been completed. This procedure now requires all planners to identify those components required to maintain equipment within the required seismic configuration on the work order utilizing appropriate drawings. The work order will also list those components that must be reinstalled to return the equipment to proper seismic configuration. Furthermore, the signature block responsibility on PWO signoff has been revised to include the responsible person to check for reinstallation of the listed seismic components.
  - B) Training of Planners, Supervisors, Foremen, and Journeymen in all maintenance disciplines will be completed by September 30, 1992. This training will stress the importance of components necessary for meeting seismic requirements and the new requirements contained in AP 0010432 "Nuclear Plant Work Orders"
4. Full compliance was achieved on July 10, 1992, upon the completion of the corrective action in paragraph 2.

Training of Planners, Supervisors, Foremen, and Journeymen in all maintenance disciplines will be completed by September 30, 1992.