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 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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 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 repts
 50-335/92-21 & 50-389/92-21. Corrective actions: locking
 devices & labels will be installed on all containment
 isolation valves located outside both units by 930301.

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February 23, 1993

L-93-046
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 92-21 - Revised

Florida Power and Light Company (FPL) has revised our previous reply to the subject notice of violation and pursuant to 10 CFR 2.201 the revised response is attached.

Very truly yours,

J. H. Goldberg by DAS

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 # 865-93

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9303010311 930223
PDR ADCK 05000335
G PDR

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Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Reply to Notice of Violation
Inspection Report 92-21 - Revised

VIOLATION:

Unit 1 and Unit 2 Technical Specifications (TS) 3.6.1.1 require that CONTAINMENT VESSEL INTEGRITY be maintained in Modes 1, 2, 3, and 4; and require that without CONTAINMENT VESSEL INTEGRITY the unit be shut down and cooled down.

Unit 1 and Unit 2 TS 1.7 define CONTAINMENT VESSEL INTEGRITY to exist, in part, when all containment vessel penetrations required to be closed during accident conditions are either: 1) Capable of being closed by an OPERABLE containment automatic isolation valve system, or 2) Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed position except as provided in a certain TS Table.

10 CFR 50 Appendix A describes containment isolation to include, for each line that penetrates the primary reactor containment and either connects directly to the containment atmosphere or is a reactor coolant pressure boundary, one locked closed or automatic isolation valve inside containment and one locked closed or automatic isolation valve outside containment.

10 CFR 50 Appendix J defines a containment isolation valve as any valve which is relied upon to perform a containment isolation function. Containment Spray valve I-V07163 is a manual drain valve from the Containment Spray line to the Auxiliary Building. It drains the Containment Spray line between the automatic containment isolation valve outside containment and the automatic containment isolation valve inside containment, and is therefore a containment isolation valve.

Unit 1 and Unit 2 TS 4.6.1.1 require that CONTAINMENT VESSEL INTEGRITY be demonstrated at least once per 31 days by verifying, in part, that all containment vessel penetrations not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions, except for those located inside Unit 1 containment or listed in a certain TS table.

Contrary to the above:

1. The licensee failed to maintain CONTAINMENT VESSEL INTEGRITY prior to November 23, 1992, in that Containment Spray drain valve I-V07163 and other non-automatic containment vessel penetration closure devices in both units, such as manual valves or blind flanges, while closed, were not secured in their closed positions as required.

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2. The licensee failed to implement the 31 day surveillance requirement of Unit 1 and Unit 2 TS 4.6.1.1 prior to November 23, 1992 in that Containment Spray drain valve I-V07163 and other non-automatic containment vessel penetration closure devices in both units, such as manual valves or blind flanges, were not verified secured in their closed positions as required.

RESPONSE:

1. REASON FOR VIOLATION

The reason for the violation was a difference in interpretation by the NRC and FPL of the CONTAINMENT VESSEL INTEGRITY definition as stated in the Technical Specifications (TS). A contributing factor was the lack of consistent regulatory guidance defining containment isolation valves.

2. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

- a. Engineering evaluations JPN-PSL-SEMS-91-027 and JPN-PSL-SEMS-91-032 were completed which assessed each mechanical containment penetration and identified those components whose integrity and/or operational position was required for containment integrity.
- b. All accessible manual valves and blind flanges identified as containment boundaries in these evaluations were verified closed by January 13, 1993.
- c. A temporary waiver of compliance from the requirements of unit 1 TS 4.6.1.1.a.1, "Containment Vessel Integrity" for inside containment isolation valves was submitted by FPL and granted by the NRC on February 12, 1993.

3. CORRECTIVE STEPS THAT WERE TAKEN TO AVOID FURTHER VIOLATIONS

- a. Locking devices and labels will be installed on all containment isolation valves located outside Unit 1 and Unit 2 containments by March 1, 1993.
- b. Labels will be installed on all blind flanges outside Unit 1 and Unit 2 containments identifying them as being under administrative control by March 1, 1993.

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- c. Surveillance requirements of containment isolation manual valves and blind flanges will be placed under procedural control of AP 1-0010125 and 2-0010125, "Schedule of Periodic Tests, Checks, and Calibrations" and 1-0010125A and 2-0010125A, "Surveillance Data Sheets" by March 1, 1993.
 - d. Containment isolation manual valves and blind flanges outside Unit 1 and Unit 2 containments will be verified to be closed every 31 days starting March 1, 1993.
 - e. Manual valves inside each containment will have locking devices and labels installed and blind flanges will be labeled during the next scheduled refueling outage on Unit 1 in June, 1993 and completed on Unit 2 during the current outage by March, 1993.
 - f. An emergency technical specification amendment deleting the requirements of TS 4.6.1.1.a.1, "Containment Vessel Integrity" for inside containment isolation valves for cycle 11 was sent to the NRC on February 16, 1993.
 - g. A change to unit 1 TS 4.6.1.1.a.1, which will make unit 1 technical specifications like the unit 2 technical specifications will be submitted. The unit 2 technical specifications do not require the surveillance of valves inside the containment every 31 days.
4. Full compliance will be achieved when the NRC approves the emergency amendment described in 3.f. above.