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ACCESSION NBR: 9305050147      DOC. DATE: 93/04/30      NOTARIZED: NO      DOCKET #  
 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 NRC ltr re violations noted insp rept  
 50-389/93-05. Corrective actions: procedures have been  
 modified to clearly define required post-test position &  
 require sign-off for each step of post-test sequence.

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APR 30 1993

L-93-100  
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 93-05

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 #899-93

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Re: St. Lucie Unit 2  
Docket Nos. 50-389  
Reply to Notice of Violation  
Inspection Report 93-05

**VIOLATION:**

During an NRC inspection conducted on February 2 - March 5, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

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 3.d includes procedures for Emergency Core Cooling System (ECCS) operation and shutdown.

Procedure OP 2-0030127, Revision 46, Plant Cooldown - Hot Standby to Cold Shutdown, Section 8.31, required the Safety Injection Tank (SIT) ECCS isolation valves to be closed during the Unit 2 shutdown.

Contrary to the above, on February 1, 1993, while Unit 2 was cooling down to perform reactor coolant pump repairs in Mode 5, operations personnel left the previously-closed SIT isolation valves open following a surveillance test. As a result, later in the cooldown, the SITs passively injected approximately four percent of their volume into the reactor coolant system. Operators noted unusual plant behavior, but did not detect that this injection had occurred for approximately two shifts.

**RESPONSE:**

1. The reason for this violation was personnel error by a licensed operator. A contributing factor was the reactor cooldown procedure did not clearly specify a post test valve position for the SIT discharge valves.
2. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED
  - a. Operations closed the SIT discharge valves and deenergized their motor operators.
  - b. The personnel involved in this event have been counselled by the Operations Supervisor on the importance of configuration control.

Re: St. Lucie Unit 2  
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3. CORRECTIVE STEPS THAT WERE TAKEN TO AVOID FURTHER VIOLATIONS

a. "Reactor Plant Cooldown - Hot Standby to Cold Shutdown" procedures (1/2-0030127) have been modified to clearly define the required post-test position and require a sign-off for each step of the post-test sequence.

b. "Surveillance Data Sheets" (1/2-0010125A Data sheet 10) procedures have been modified to reference the "Reactor Plant Cooldown - Hot Standby to Cold Shutdown" procedures (1/2-0030127) for appropriate post-test valve position.

4. Full compliance was achieved on February 2, 1993 with the completion of corrective action 2.a above.