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 FACIL: 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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 GOLDBERG, J.H. Florida Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC ltr re violations noted in insp rept
 50-389/93-08.C/As: mechanical maint will revise control of
 purchase matl, equipment & svcs to establish specific
 guidelines re quality review of contractor procedures.

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MAY 11 1993

L-93-118
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 93-08

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,

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

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Docket Nos. 50-389
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VIOLATION:

During an NRC inspection conducted on March 10-17, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

- A. 10 CFR, Part 50, Appendix B, Criterion IX, as implemented by FPL Topical Quality Assurance Report (FPLTQAR 1-76A), requires measures be established to assure that special processes, including welding, be accomplished in accordance with applicable codes. The American Society of Mechanical Engineers Boiler and Pressure Vessel (ASME B&PV) Code, Section III, 1986 Edition with no Addenda, Subsection NB, has been identified as the applicable code for the repair of the St. Lucie Pressurizer.

[1] ASME B&PV Code Section III, Paragraph NB-4622.11(c)(6), requires that the first layer of weld metal of a temper bead repair be deposited using a 3/32 inch diameter electrodes, that the weld bead crown be removed by grinding, and the second layer be deposited with an 1/8 inch diameter electrode.

[2] Paragraph NB-4622.11(c)(5), requires that the weld area, on a temper bead repair, plus a band around the weld for five inches be preheated to a minimum temperature of 350 F and a maximum interpass temperature of 450 F during welding, monitored by thermocouple and recording instruments.

[3] Paragraphs NB-4622.11(c)(5) and NB-4435 (b) require the immediate area around the temporarily attached thermocouple be marked so the removal area can be identified after their removal for subsequent Nondestructive Examination.

Contrary to the above, on March 13, 1993, the requirements of ASME B&PV Code Paragraphs Nos. [1] NB-4622.11(c)(6), [2] NB-4622.11(c)(5), [3] NB-4622.11(c)(5), and NB-4435(b) were not incorporated, or not correctly incorporated, into the instructions and procedures for the accomplishment of the temper bead repair to four pressurizer, one inch diameter, vapor space, nozzles. These discrepancies went undetected by the authors and reviewers at the Nuclear Steam Supply System supplier, ASEA Brown Boveri/Combustion Engineering, as well as all the licensee's technical reviewers, including the St. Lucie Facility Review Group. The end result of above discrepancies and oversights was the following:

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[1] The second layer of the temper bead repair to all four Pressurizer one inch vapor space nozzles was deposited with 3/32 inch diameter electrodes instead of the ASME Code required 1/8 inch diameter electrode; (The reviewed and approved procedure allowed the use of 3/32 inch electrode.)

[2] The preheat temperature of a band of four inches or less around the welds was monitored instead of the required five inch band; and

[3] The location of the temporary attachment thermocouple welds were not marked prior to their removal.

RESPONSE:

1. The reasons for the violation were failure to identify procedural errors and failure to comply with a procedural requirement.

2. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

- a) Facility Review Group (FRG) 93-60 convened to review ABB-CE's response to NCR 2001935-4 which was written to address the issue of the incorrect electrode size. The decision was made to grind out both the first and second passes to ensure that the improperly installed weld material would be completely removed.
- b) A review was conducted on all ABB-CE documentation associated with Unit 2 pressurizer nozzle repairs to assure compliance with applicable ASME requirements.
- c) ABB-CE removed the improperly installed weld material in accordance with NCR 2001935-4 and ASME requirements on weld repair.
- d) FPL provided dedicated welding and code engineers at the job site to assure that ABB-CE's implementation of the welding process was in accordance with the ASME requirements.
- e) CE's Welding and Task Supervisor was required to be at the job site during the welding evolution.
- f) ABB-CE provide a dedicated Project Manager to assist with the implementation of the weld repair.

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- g) A QA Audit of the contractor evolutions was initiated to ensure compliance with QA program requirements.
- h) FPL initiated continuous QC oversight at the work location to ensure the quality of the work practices.
- i) FPL initiated a technical team review of all subsequent ABB-CE procedure changes to ensure verbatim compliance with ASME Code requirements.
- j) FPL Nuclear Engineering performed a Safety Evaluation which concluded that a failure of the improperly installed 3/32 inch temper bead weld would not result in a significant safety issue if the improper use of the weld rod would have gone undetected.
- k) ABB-CE performed a weld qualification on the off-specification 3/32 inch electrode temper bead weld repair. The results of the test confirmed that the use of the 3/32 inch electrode would not have reduced component integrity.

3. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

- a) Mechanical Maintenance will revise QI 7-PR/PSL-1, Control of Purchased Material, Equipment, and Services, to establish specific guidelines regarding technical and quality reviews of contractor procedures by August 31, 1993.
 - b) Mechanical Maintenance will revise QI 7-PR/PSL-1, Control of Purchased Material, Equipment, and Services, to ensure that contractors are well informed during the contractor orientation phase concerning the FPL policy regarding failure to follow procedures by August 31, 1993.
4. Full compliance was achieved on April 16, 1993, with the completion of actions listed in item 2 above.

The corrective actions of item 3 will be completed by August 31, 1993.