

NOTICE OF VIOLATION

Florida Power & Light Company  
St. Lucie 1 and 2

Docket No. 50-335 and 50-389  
License No. DPR-67 and NPF-16

During an NRC inspection conducted September 26 through October 23, 1993, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Technical Specification (TS) 6.8.1.a requires that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, paragraph 1.d includes administrative procedures for procedure adherence and temporary change methods. Appendix A, paragraph 9 includes procedures for performing maintenance.

Procedure QI 5-pr/PSL-1, Revision 53, "Preparation, Revision, Review/Approval of Procedures," Section 5.13.2 stated that all procedures shall be strictly adhered to. Letter of Instruction LOI-T-078, Revision 0, "Ultimate Heat Sink Air Accumulator Tank Repairs," required that temporary air sources be connected to the emergency air system for the Ultimate Heat Sink (UHS) valves. The temporary air sources were to be connected at valves V-37226, V-37227, and 37220 to supply temporary air for the Ultimate Heat Sink (UHS) valves.

Contrary to the above, on October 7, 1993, written procedures were not implemented in that the temporary air supply connected at valve V-37226 was removed and utilized as the temporary air source at valve V-37220, leaving valve V-37226 without a temporary air source. The change in configuration was due to a lack of an available third air source and was made in the absence of a procedure change.

This is a Severity Level IV Violation (Supplement I).

- B. 10 CFR 50.59 requires that the licensee maintain records of changes to the facility, as described in the Final Safety Analysis Report (FSAR), and that these records include a written safety evaluation which provides the basis for the determination that the change does not involve an unreviewed safety question.

Unit 1 FSAR Section 9.2.7.2.1, including figure 9.2-6f and Unit 2 FSAR section 9.2.5, describes the design of the Ultimate Heat Sink (UHS) as well as the configuration of the air supply system.

Contrary to the above, in October, 1993, the licensee made changes to the facility, as described in the FSAR, without a written safety evaluation documenting that an unreviewed safety question did not exist. To support repairs to the Ultimate Heat Sink (UHS) air accumulator, the licensee made temporary modifications to the air supply to the two UHS valve actuators as described in LOI-T-078, "Ultimate Heat Sink Air Accumulator Tank Repairs," Rev. 0. The modifications included supplying pressure-regulated nitrogen to the UHS valve actuators, removing the air

accumulator tank, and replacing the tank with a mechanical jumper. These modifications constituted changes to the UHS valve actuator air supply as described in section 9.2.7.2.1 and figure 9.2-6f of the Unit 1 FSAR and section 9.2.5 of the Unit 2 FSAR. During this time, both Unit 1 and Unit 2 were operating in Mode 1 and the UHS valves were considered operable as required by Unit 1 TS 3.7.5.1 and Unit 2 TS 3.7.5.1.

This is a Severity Level IV Violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, the Florida Power & Light Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the St. Lucie site, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia  
this 22nd day of November 1993