

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9312280142 DOC. DATE: 93/12/20 NOTARIZED: NO DOCKET #
 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
 50-398 Mendocino, Unit 1, Pacific Gas & Electric Co. 05000398
 AUTH. NAME AUTHOR AFFILIATION
 GOLDBERG, J.H. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in insp repts 50/-335/93-301 & 50-389/93-301. Corrective actions: full compliance achieved on 931216 w/development of EOP 99, App U & App J.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 2
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES: Application withdrawn 1/19/73. 05000398

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	
	PD2-2 PD	1 1	NORRIS, J	1 1	
INTERNAL:	ACRS	2 2	AEOD/DEIB	1 1	
	AEOD/DSP/ROAB	1 1	AEOD/DSP/TPAB	1 1	
	AEOD/TTC	1 1	DEDRO	1 1	
	NRR/DORS/OEAB	1 1	NRR/DRCH/HHFB	1 1	
	NRR/DRIL/RPEB	1 1	NRR/DRSS/PEPB	1 1	
	NRR/PMAS/ILPB1	1 1	NRR/PMAS/ILPB2	1 1	
	NUDOCS-ABSTRACT	1 1	OE DIR	1 1	
	OGC/HDS3	1 1	REG. FILE 02	1 1	
	RES/HFB	1 1	RGN2 FILE 01	1 1	
	RGN5 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 PI-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 25 ENCL 25

R
I
D
S
/
A
D
D
S



FPL

P.O. Box 14000, Juno Beach, FL 33408-0420

DEC 20 1993

L-93-313
10 CFR 2.201

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: St. Lucie Unit Nos. 1 and 2
Docket Nos. 50-335 & 50-389
Reply to Notice of Violation
Inspection Report 93-301

Florida Power and Light Company has reviewed the subject inspection report and pursuant to 10 CFR 2.201 the response 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

DAS/PSL #1035-93

9312280142 931217
PDR ADOCK 05000335
Q PDR

an FPL Group company

IFOL
11

St. Lucie Unit Nos. 1 and 2
Docket Nos. 50-335 & 50-389
Reply to Notice of Violation
Inspection Report 93-301

Violation:

During an NRC inspection conducted on October 25-29, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," the violation listed below:

Unit 1 Technical Specifications, Section 6.8.1, states in part that written procedures shall be established, implemented and maintained.

Quality Instruction No. QI 5-PR/PSL-1, Revision 53, Preparation, Revision, Review/Approval of Procedures section 5.1.10, required procedures to have steps listed in chronological order listing valve numbers.

Contrary to the above, Off-Normal Operating Procedure 1-0030135, Revision 15, Control Room Inaccessibility, does not contain instrument air valve numbers for operating the Atmospheric dump valves locally on Unit 1.

Response:

1. The reason for the violation was a difference in the threshold used by FPL operations management and the NRC inspection staff when considering whether a task falls within the skill of the operator versus the requirement for detailed procedural guidance. FPL operations management concurs with the violation and has raised its threshold to encompass tasks such as this when determining whether a procedure should be written.
2. On December 16, 1993, this task was proceduralized into Emergency Operating Procedure 99, Appendix U, "Manual Operation of the Atmospheric Dump Valves" and Appendix J, OP 1-0030135 "Control Room Inaccessibility." These procedures are only applicable to Unit 1.
3. During periodic reviews of procedures conducted by the operations department, the review shall specifically address the need to review the procedure for tasks which may be outside the skills of the operator using the new threshold.
4. Full compliance was achieved on December 16, 1993, with the development of Emergency Operating Procedure 99, Appendix U, "Manual Operation of the Atmospheric Dump Valves" and Appendix J, OP 1-0030135 "Control Room Inaccessibility."