

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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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.  
 RECIPIENT NAME      RECIPIENT AFFILIATION  
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SUBJECT: Responds to violations noted in insp repts 50-335/93-22 & 50-389/93-22. Corrective actions: third nitrogen source installed at V-37226 on 931011 & all sys engineers counselled re strict compliance to plant procedures.

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L-93-311  
10 CFR 2.201

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
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Gentlemen:

Re: St. Lucie Unit Nos. 1 and 2  
Docket Nos. 50-335 & 50-389  
Reply to Notice of Violation  
Inspection Report 93-22

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 #1033-93

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St. Lucie Unit Nos. 1 and 2  
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Violation (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.

Response (A):

1. The reason for the violation was a cognitive personnel error on the part of the system engineer to perform a temporary change to LOI-T-078, Revision 0, "Ultimate Heat Sink Air Accumulator Tank Repairs."
2. A third nitrogen source was installed at V-37226 on October 11, 1993 in accordance with the procedure. The remaining phases of the procedure were completed on November 15, 1993.
3. All system engineers were counselled regarding strict compliance to plant procedures and the process for authorizing temporary changes to procedures.
4. Full compliance was achieved on October 11, 1993 when the third nitrogen source was installed at V-37226.

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Violation (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.

Response (B):

1. The reason for the violation was an incorrect interpretation of the 10 CFR 50.59 requirements.
2. A safety evaluation was written for LOI-T-078, "Ultimate Heat Sink Air Accumulator Tank Repairs," on November 5, 1993. The safety evaluation concluded that an unreviewed safety question did not exist.

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3. a. The following procedures affecting or relating to 10 CFR 50.59 have been changed to provide consistent in depth questions identifying adequate screening criteria for writing a safety evaluation:

QI 5-PR/PSL-1 "Preparation, Revision, Review/Approval of Procedures"

AP 0010124 "Control and Use of Jumpers and Disconnected Leads"

AP 0005769 "10 CFR 50.59 Safety Evaluation Guidelines"

These methodologies have been standardized with the Nuclear Engineering Department so that a standard methodology is now used.

b. All Technical Staff engineers performing safety evaluations have been counselled as to the importance of properly documenting unreviewed safety question determinations via safety evaluations.

4. Full compliance was achieved on November 5, 1993 when a safety evaluation was written for LOI-T-078, "Ultimate Heat Sink Air Accumulator Tank Repairs."

