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 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.

AUTH. NAME: GOLDBERG, J.H. AUTHOR AFFILIATION: Florida Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to violations noted in Insp Rept
 50-335/93-24. Corrective actions: spent resin tank pressure
 limitation increased to agree w/actual field conditions.

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FEB 25 1994

L-94-45
10 CFR 2.201

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

Gentlemen:

Re: St. Lucie Unit No. 1
Docket No. 50-335
Reply to Notice of Violation
Inspection Report 93-24

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/LLM/kw

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, USNRC Region II
Senior Resident Inspector, USNRC, St. Lucie Plant

DAS/PSL # 1072-94

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St. Lucie Unit No. 1
Docket No. 50-335
Reply to Notice of Violation
Inspection Report 93-24

Violation:

Unit 1 TS 6.8.1.a required 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 7.b, Solid Waste System, included "spent resins and filter sludge handling." This was further implemented on site by St. Lucie procedure OP 1-0520020, Revision 30, Radioactive Resin Replacement. Pertinent attributes follow:

- OP 1-0520020, Section 4.0, Limits and Precautions, stated that a Nuclear Watch Engineer [a licensed SRO] should coordinate and supervise each resin discharge operation.
- OP 1-0520020, Appendix L, Resin Transfer For Spent Resin Tank, had a note to "ensure positive communication exists..."
- OP 1-0520020, Section 4.0, required "Do not exceedSRT [spent resin tank] pressure of 25 psig or shipping container pressure of 10 psig during sluicing operations.
- OP 1-0520020 did not discuss valve manipulations to add water to the resin discharge pipe via a bypass line if the resin entering the shipping cask were judged to be too dry.

Contrary to the above, on December 2, 1993, the licensee failed to adequately implement (follow) and maintain OP 1-0520020, Rev 30, in that:

1. The Nuclear Watch Engineer was not present at the scene during the transfer, nor was another person at the scene designated "in charge".
2. The communications arrangement was not "positive" in that, a wall phone was used which prevented viewing of gage PI 6644, spent resin tank pressure, while the operator was in direct communication.
3. Operators did not monitor Gage PI 06-44, which displayed the "[10 psig limit] shipping container or cask inlet pressure." Consequently, the spent resin tank procedural pressure limit of 25 psig and the PI 06-44 procedural pressure limit of 10 psig were exceeded during sluicing operations.
4. Procedure OP 1-0520020 had not been updated to correct previously identified inadequacies regarding adding bypass water to control the dryness of the resin bead slurry. As a result, operators manipulated valves outside of the procedure to provide a bypass flow path for the additional water desired.

St. Lucie Unit No. 1
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Response:

1. The reason for the violation was that utility operators failed to properly implement and maintain Operating Procedures (OP) 1&2-0520020 "Radioactive Resin Replacement".
2. A complete debrief was performed by the crew conducting the resin transfer evolutions to identify all problem areas and proposed corrective actions. OP 1&2-0520020 have been revised to address the identified deficiencies.
 - A. The Nuclear Watch Engineer or Operations Systems Specialist is required to be present in the field when the actual resin transfer takes place.
 - B. Specific precautions have been added to maintain radio contact between the Operations department and Health Physics staff during the resin transfer.
 - C. The spent resin tank pressure limitation was increased to agree with actual field conditions. This increase in pressure is within the design of the system. The pressure limitation on the disposal container was deleted. This limitation is no longer applicable to the resin fill head design.
 - D. Valves required to be manipulated for control of slurry consistency have been specified in OP 1&2-0520020.

OP 2-0520020 was successfully implemented with all revised requirements in place on February 4, 1994.
3. No further corrective actions are deemed necessary.
4. Full compliance was achieved on February 25, 1994.