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

SUBJECT: Responds to NRC ltr re violations noted in insp rept
 50-389/94-08. Corrective actions: manager met w/ involved
 individual & remaining personnel to discuss importance of
 initiating NCR for identification.

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MAY 06 1994

L-94-106
10 CFR 2.201

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

Re: St. Lucie Unit 2
Docket Nos. 50-389
Reply to Notice of Violation
Inspection Report 94-08

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,

A handwritten signature in cursive script, appearing to read 'J. H. Goldberg', is written over the typed name.

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 #1109-94

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PDR ADOCK 05000389
Q PDR
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Re: St. Lucie Unit 2
Docket Nos. 50-389
Reply to Notice of Violation
Inspection Report 94-08

VIOLATION A.

10 CFR 50, Appendix B, Criterion V, as implemented by Florida Power and Light (FP&L) Topical Quality Report 1-76A, requires that activities affecting quality shall be prescribed by documented instructions or procedures of a type appropriate to the circumstances, and shall be accomplished in accordance with these instructions or procedures. FP&L Administrative Site Procedure ASP-8, Corrective Action, Revision 6, requires that discrepancies that require an engineering evaluation be documented, evaluated and dispositioned using a Nonconformance Report (NCR). The Note under Paragraph 7.2 of FP&L Administrative Site Procedure ASP4, Revision 4, states that a Change Review Notice shall not be utilized in lieu of a NCR to correct deviations from design documents.

Contrary to the above, on March 10, 1994, NRC identified that a Nonconformance report had not been initiated to document a damaged pipe and pipe support end piece at pipe support number RC-4300-138. The damaged pipe and pipe support was repaired using a Change Review Notice which was initiated on March 5, 1994 and approved on March 7, 1994. The repair work was completed prior to March 10, 1994.

RESPONSE A:

1. REASON FOR VIOLATION

The root cause of this event was personnel error on the part of a construction services worker. A NCR was not written on a potential field discrepancy as required by procedure.

2. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

On March 10, 1994 NCR 044-293-3025 was initiated to provide proper evaluation and disposition of the potential field discrepancy.

3. CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS

a. The Construction Services Manager met with the individual involved and the remaining construction services field personnel to discuss the importance of initiating a NCR for root cause identification and determination of safety significance.

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b. A change to plant QI 15-PR/PSL-1 "Non-conforming Materials, Parts, and Components" and Construction ASP-8 "Corrective Action" has been implemented to provide clarification of when a NCR is required. In addition, a memo from the Site Vice President has been sent to the plant staff referencing these changes and conveying the importance of initiating a NCR for root cause identification and determination of safety significance.

4. Full compliance was achieved on March 10, 1994 with the initiation of NCR 044-293-3025.

VIOLATION B.

10 CFR 50, Appendix B, Criterion V, as implemented by FP&L Topical Quality Report 1-76A, requires that activities affecting quality shall be prescribed by documented instructions or procedures of a type appropriate to the circumstances, and shall be accomplished in accordance with these instructions or procedures..

Contrary to the above, on March 11, 1994, NRC identified that the inspection of the Safety Relief Valve (SRV) and Power Operated Relief Valve (PORV) discharge piping and associated pipe supports following the November 24, 1992, waterhammer event, and the engineering evaluation of the effects of the waterhammer event on the structural integrity of the piping, were accomplished without the use of documented instructions or procedures. Subsequently, functional testing of snubbers completed on March 10, 1994, identified that five snubbers on the SRV and PORV discharge piping had been inoperable since the November 24, 1992 waterhammer event.

RESPONSE B:

1. REASON FOR VIOLATION

A self-assessment conducted by the plant staff evaluated this event and determined the primary root cause to be a programmatic weakness in the NCR program which resulted in a NCR not being written. A contributing factor was that a non-conservative load direction assumption was used in estimating the water-hammer event.

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2. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

The following actions were taken during the 1994 refueling outage:

a. Functional testing of all snubbers on the PORV and SRV discharge piping was performed in accordance with ISI procedures. Four mechanically failed snubbers were identified and subsequently replaced (NCRs 2-565, 2-568, 2-569, 2-570).

b. All PORV and SRV discharge piping welded attachments for supports/restraints were VT-1 inspected in accordance with NDE procedures. No deviating conditions or rejectable indications were noted.

c. The PORV and SRV pressurizer nozzle to vessel welds were VT-1 inspected in accordance with NDE procedures. No indications were noted.

d. The SRV pressurizer nozzle flange welds and selected "high-stress" welds of the PORV inlet piping (including the pressurizer nozzle safe-end to pipe and safe-end to nozzle welds) were PT tested in accordance with NDE procedures. No rejectable indications were noted. In addition to the liquid penetrant test, an ultrasonic inspection was performed on the PORV nozzle safe-end to pipe weld and the nozzle to safe-end weld. No rejectable indications were noted.

e. Selected PORV inlet piping welds (safe-end to pipe and 4" tee) were UT tested in accordance with NDE procedures. No rejectable indications were noted.

3. CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS

a. The Nuclear Engineering Department has issued a Technical Alert to all of its St. Lucie and Turkey Point engineering groups. This Technical Alert discusses the lessons learned from the 1992 water hammer event and cautions engineers on making assumptions based solely on observed physical damage.

b. A change to plant QI 15-PR/PSL-1 "Non-conforming Materials, Parts, and Components" and construction ASP-8 "Corrective Action" has been implemented to provide clarification of when a NCR is required. In addition, a memo from the Site Vice President has been sent to the plant staff referencing these changes and conveying the importance of initiating a NCR for root cause identification and determination of safety significance.

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4. Full compliance was achieved on March 30, 1994 with the completion of the corrective actions 2 (a-e) above.