

ACCELERATED DOCUMENT DISTRIBUTION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9406080058 DOC. DATE: 94/05/27 NOTARIZED: NO DOCKET #
 FACIL: 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH. NAME: GOLDBERG, J.H. AUTHOR AFFILIATION: Florida Power & Light Co.
 RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 940407 ltr re violations noted in insp rept 50-389/94-10. Corrective actions: personnel were retrained to ensure clear understanding of procedural requirements associated w/dimensional tolerances.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT		COPIES		RECIPIENT		COPIES	
	ID CODE/NAME		LTTR	ENCL	ID CODE/NAME		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	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				
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 P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 23 ENCL 23



FPL

MAY 27 1994

L-94-129
10 CFR 2.201

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

Re: St. Lucie Unit 2
Docket No. 50-389
Reply to Notice of Violation
Inspection Report 94-10

Florida Power and Light Company (FPL) has reviewed the subject inspection report and pursuant to 10 CFR 2.201 the response to the subject notice of violation is attached.

Very truly yours,

J. H. Goldberg
President - Nuclear Division

JHG/JWH/kw
DAS/PSL #1131-94

Attachment

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

9406080058 940527
PDR ADOCK 05000389
PDR

an FPL Group company

St. Lucie Unit 2
Docket No. 50-389
Reply to Notice of Violation
Inspection Report 94-10

VIOLATION:

10 CFR 50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be prescribed by instructions, procedures or drawings and shall be accomplished in accordance with these instructions, procedures, or drawings.

10 CFR 50, Appendix B, Criterion X, requires, in part, that a program for inspection of activities affecting quality shall be ...executed... to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity.

For repair of the pressurizer vapor space nozzles, paragraph 13 and 14 of Welding Service, Inc. Work Procedure 3403304, Revision 2, Weld Performance, Post Weld Heat Treatment and Nozzle Installation, St Lucie Unit 2, Nozzles B and C, and referenced Florida Power and Light Company Plant Change/Modification 038-294 requires that: (1) the J-weld preparation (PREP) for attaching the nozzles to the pressurizer be ground to an angle of $45^{\circ} +0^{\circ}/-5^{\circ}$, and (2) the J-weld PREP be dimensionally inspected and signed off by Quality Control.

Contrary to the above, on April 7, 1994, activities affecting quality were not accomplished in accordance with prescribed procedures and the program for inspection of activities affecting quality was not executed to verify conformance with documented procedures in that, the J-weld PREP bevel angles were ground to 50-52 degrees for nozzle "C" and 38-45 degrees for nozzle "B". The PREPs were dimensionally inspected and accepted by Quality Control.

St. Lucie Unit 2
Docket Nos. 50-389
Reply to Notice of Violation
Inspection Report 94-10

RESPONSE:

1) REASON FOR THE VIOLATION:

The reasons for the violation were attributed to:

- A) human error, in that the Contractor's QC inspector did not accomplish the J-bevel weld prep inspection in accordance with the drawing dimensional requirements, and
- B) inadequate oversight of the contractor by FPL.

2) CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

- A) Contractor Inspection and Production personnel were re-trained to ensure a clear understanding of procedural requirements associated with dimensional tolerances.
- B) The single template originally used for measuring the J-weld prep was replaced with two new templates to cover the range of acceptable J-weld prep angles. These templates improved the accuracy of the angle measurement.
- C) Engineering issued a Change Request Notice to allow a larger tolerance on the J-weld prep bevel angle as allowed by the ASME code.
- D) The B and C nozzle weld preps were re-performed using the new tolerance provided by Engineering. The weld preps were verified to meet the tolerance with the improved templates.
- E) The A and D nozzle weld preps were performed using the new tolerance and were verified to meet the tolerance with the improved templates.

St. Lucie Unit 2
Docket Nos. 50-389
Reply to Notice of Violation
Inspection Report 94-10

3) CORRECTIVE ACTION TO AVOID FURTHER VIOLATIONS:

- A) The Nuclear Materials Management Department has revised its process for the issuance of contracts to outside vendors. This revised process includes monetary penalty factors for the violation of site requirements during the implementation of the contracted work activities. This corrective action will strengthen the existing procedural requirement of QI 7-PR/PSL-1, "Control of Purchased Material, Equipment, and Services" to ensure contractors are informed of the FPL policy regarding failure to follow procedures.
- B) When contracts are awarded for safety related work, the contractor's QA program and procedures will continue to be reviewed in accordance with QI 7-PR/PSL-1, "Control of Purchased Material, Equipment, and Services." This procedure is being revised to require the assignment of FPL QC holdpoints as a secondary check on contractor QC activities. This procedure revision will be completed by July 1, 1994.

4) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance was achieved on April 8, 1994, with the completion of corrective action 2.d above.