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

SUBJECT: Responds to violation noted in Insp Repts 50-335/94-12 & 50-389/94-12. Corrective actions: loop testing, load shedding & subsequent reloading of C Intake CW & CCW pumps aligned to alternate power supply busses performed.

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JUN 15 1994

L-94-133
10 CFR 2.201

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

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Reply to Notice of Violation
Inspection Report 94-12

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,

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 05000335
Q PDR

an FPL Group company

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
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VIOLATION:

10 CFR 50, Appendix B, Criterion XVI, Corrective Action, as implemented by approved FPL Topical Quality Assurance Report, TQR 16.0 revision 8, "Corrective Action," requires that measures be established to assure that conditions adverse to quality, including deficiencies and deviations, be promptly identified and corrected.

Contrary to the above, the licensee failed to take adequate corrective actions for Violation 335,389/92-05-04 for failure to adequately surveillance test the ability of the "C" Intake Cooling Water (ICW) pump to energize following a loss of offsite power (LOOP). The licensee's corrective action, completed on March 3, 1992, included a revision to procedure OP 2-0400050, Periodic Integrated Test of the Engineered Safety Features. Test procedures OP 1-0400050 and OP 2-0400050 remained inadequate, in that, they did not verify proper C train ICW and Component Cooling Water (CCW) pump (swing pump) load shed and sequencing functions when powered from their alternate power supply busses.

On April 3, 1994, during post-modification testing, the 2C ICW and CCW pumps failed to load shed from the B-train safety bus following a LOOP. Subsequent licensee analysis concluded that the 2B EDG was capable of performing its design function.

RESPONSE:

1. REASON FOR VIOLATION

FPL concurs that a violation existed. The root cause of this violation was an inadequate procedure. The Safeguards procedure failed to adequately test the swing pumps. Specific corrective action was taken for the first violation. However, the scope of the review following the initial violation was not expanded sufficiently to ensure adequate testing of the swing pumps in all possible configurations. Additional testing is required to ensure that the intent of Technical Specification Surveillance Requirements is met.

2. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

A. LOOP testing, load shedding and subsequent reloading of the C ICW and CCW Pumps aligned to their alternate power supply busses was performed as part of post-modification testing for the ICW and CCW Pumps. This testing was completed on April 3, 1994. Completion of this testing put Unit 2 in full compliance with the Technical Specification.

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- B. An Operations Night Order was issued on May 3, 1994 stating to all Operations personnel that during the 18 month Unit 1 Safeguards testing the "C" ICW and CCW Pumps were not tested while aligned to their alternate power supply busses. The Night Order states the "C" ICW and CCW Pumps are inoperable while aligned to their alternate power supply busses. This Night Order will be in effect until the surveillance test is performed on the Unit 1 alternate power supply buss load shedding relays. Unit 1 was in full compliance on May 3, 1994 by administratively declaring the 1C ICW and 1C CCW Pumps inoperable if aligned to the alternate power supply busses.

3. CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS

- A. An interim test is being developed which will test the Unit 1 alternate power supply busses load shedding relays. This test will be completed prior to declaring the 1C ICW and 1C CCW pumps operable if aligned to the alternate power supply busses.
- B. A complete review will be performed on the Swing Bus Testing for both Unit 1 and Unit 2 Safeguards testing procedures to ensure compliance with the Technical Specification Surveillance Requirements. The Unit 1 Safeguards testing procedure Periodic Integrated Test of the Engineered Safety Features OP#1-0400050 will be revised to ensure testing of the Unit 1 alternate power supply busses load shedding relays prior to performance of the next scheduled 18 month surveillance testing during the Cycle 13 refueling outage. The Unit 2 Safeguards testing procedure Periodic Integrated Test of the Engineered Safety Features OP#2-0400050 will be revised to ensure testing of the Unit 2 alternate power supply busses load shedding relays prior to performance of the next scheduled 18 month surveillance testing during the Cycle 9 refueling outage.
4. Full compliance was achieved April 3, 1994 on Unit 2 with the completion of Corrective Action 2.A. above.
- Full compliance was achieved May 3, 1994 on Unit 1 with the completion of Corrective Action 2.B. above.