

# PRIORITY 1

(ACCELERATED RIDS PROCESSING)

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9408150126      DOC. DATE: 94/07/07      NOTARIZED: NO      DOCKET #  
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 NRC 940503 ltr re violations noted in insp rept  
50-335/94-11 & 50-389/94-11. Corrective action: completed  
actuator assembly & valve internals of MV-08-12 & MV-08-13  
were replaced.

DISTRIBUTION CODE: IE01D      COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3  
TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES 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/PMAS/IRCB-E	1 1	NUDOCS-ABSTRACT	1 1
	OE DIR	1 1	OGC/HDS3	1 1
	REG FILE 02	1 1	RES/HFB	1 1
	RG2 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. 504-2083) TO ELIMINATE YOUR NAME FROM  
DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 21 ENCL 21

P  
R  
I  
O  
R  
I  
T  
Y  
1  
D  
O  
C  
U  
M  
E  
N  
T



July 7, 1994

L-94-166  
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 94-11

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 #1150-94

150600

9408150126 940707  
PDR ADOCK 05000335  
Q PDR

an FPL Group company

IF01  
11

Re: St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
Reply to Notice of Violation  
Inspection Report 94-11

**VIOLATION:**

10 CFR 50 Appendix B, Criterion XVI, requires measures which assure that conditions adverse to quality are promptly identified and corrected. For significant conditions, the identification, cause, and corrective action taken are required to be documented and reported to appropriate levels of management.

Contrary to the above, on May 3, 1994, in three instances the licensee's measures had not been effective in assuring that: (1) conditions adverse to quality would be promptly identified and corrected; and (2) the identification and correction of significant conditions adverse to quality were documented and reported to management. The significant conditions adverse to quality involved stall failures of redundant Unit 2 motor-operated valves (MOVs) 2-MV-08-12 and -13, which operate to supply steam to the Unit 2 Turbine Driven Auxiliary Feedwater Pump. Valve 2-MV-08-12 stalled when actuated to open on November 11, 1991, and 2-MV-08-13 similarly stalled on September 15, 1992 and July 20, 1993. The licensee did not identify that the stall thrust and torque forces had exceeded the associated actuator and valve maximum limits. Corrective actions documented did not provide an adequate basis for returning the actuator and valve to operation.

**RESPONSE:**

1. REASON FOR VIOLATION

Plant Maintenance Procedure 0950065 "Troubleshooting Limitorque Valve Actuators" did not include the recommendations of "Limitorque Maintenance Update 92-1" and "Limitorque Technical Update 92-1." These documents contain calculations used to determine the approximate loads the actuators and valves may have seen under stall conditions. Performing these calculations help in determining if damage has occurred based on allowable overloads. This was erroneously deemed unnecessary by electrical maintenance and engineering personnel due to the capability of the MOV diagnostics equipment to predict problems with the components of concern during potential stall events. The recommended calculations were performed at the time of this inspection and proved that the stall thrust and torque forces had not exceeded the associated actuator and valve maximum limits.

2. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

The complete actuator assembly and valve internals of MV-08-12 and MV-08-13 were replaced on April 15, 1994 to ensure increased reliability. No further problems have been experienced with these valves.

Re: St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
Reply to Notice of Violation  
Inspection Report 94-11

3. CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS

Plant Maintenance Procedure 0950065 "Troubleshooting Limitorque Valve Actuators" has been changed to include a reference to the recommendations of "Limitorque Maintenance Update 92-1" and "Limitorque Technical Update 92-1." This will ensure that the necessary calculations are performed and documented when a MOV has stalled.

4. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on April 15, 1994 with the completion of corrective action 2 above.