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

SUBJECT: Responds to notice of violations noted in insp rept
50-389/94-15. Corrective actions: plant shutdown & entered
mode 3 on 940714.

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SEP 15 1994

L-94-233
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 94-15

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 black ink that reads 'J. H. Goldberg'.

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 #1196-94

200020

9409210319 940915
PDR ADDEK 05000389
Q PDR

an FPL Group company

Handwritten initials 'JEO' in black ink, with a vertical line to the right of the letters.

Re: St. Lucie Unit 2
Docket No. 50-389
Reply to Notice of Violation
Inspection Report 94-15

VIOLATION:

St. Lucie Unit 2 Technical Specification 3.3.1, Table 3.3-1, item 12, required, in part, that 4 channels of TCBs be operable in Mode 1. The associated LCO action statement required that an inoperable channel be placed in the tripped condition within 1 hour; otherwise, the unit was required to be in Mode 3 within 6 hours.

Contrary to the above, on July 14, 1994, when Trip Circuit Breaker TCB-5 failed to open when required, was declared inoperable, and the breaker's failure mode prevented placing the affected channel in the tripped condition, the associated shutdown to Mode 3 was not performed in the required 6 hours.

While the unit was ultimately shut down, entrance into Mode 3 occurred approximately 7-1/2 hours after declaring the Trip Circuit Breaker inoperable. Further, the shutdown was premised on a management directive, as opposed to a Technical Specification requirement. While the licensee interrupted TCB-5's electrical flow path by opening Trip Circuit Breakers TCB-1, TCB-2, and TCB-6, the subject Technical Specification action statement was prescriptive in requiring that either Trip Circuit Breaker TCB-5 be opened or that the unit be shut down.

RESPONSE:

1. REASON FOR VIOLATION

FPL concurs that a violation existed. The root cause of the violation was personnel error on the part of Operations Management.

2. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

The plant was shutdown and entered Mode 3 at 11:06 a.m. on July 14, 1994.

3. CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS

A. The Site Vice President and Plant General Manager have reviewed this event with Operations Management and other key site personnel. The need for strict adherence to Technical Specifications has been emphasized.

B. Operations Management have been made aware that other sources within the Nuclear Division are available to aid in their decision making process when events arise that involve complex or previously unencountered situations.

4. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved when the plant entered Mode 3 at 11:06 a.m. on July 14, 1994.